



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA

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Order Instituting Rulemaking to Promote Policy	)	
and Program Coordination and Integration in	)	
Electric Utility Resource Planning.	)	Rulemaking 04-04-003
	)	(Filed April 1, 2004)
Order Instituting Rulemaking to Promote	)	
Consistency in Methodology and Input	)	
Assumptions in Commission Applications of	)	Rulemaking 04-04-025
Short-run and Long-run Avoided Costs, Including	)	(Filed April 22, 2004)
Pricing for Qualifying Facilities.	)	

SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E)  
COMMENTS ON ALTERNATE PROPOSED DECISION OF  
COMMISSIONER GRUENEICH

MICHAEL MONTOYA  
BERJ K. PARSEGHIAN

Attorneys for  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770  
Telephone: (626) 302-3102  
Facsimile: (626) 302-1904  
E-mail: Berj.Parseghian@sce.com

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**Southern California Edison Company's (U 338-E)  
Comments on Alternate Proposed Decision of Commissioner Grueneich**

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Pursuant to Rule 14.3 of the Commission’s Rules of Practice and Procedure, Southern California Edison Company (SCE) respectfully submits these comments on the Alternate Proposed Decision of Commissioner Grueneich issued on August 20, 2007 (Alternate).

The Alternate contains numerous errors which will produce above-market payments to qualifying facilities (QFs), in violation of federal law. The Alternate calculates QF energy prices using a formula that blends an out-of-date incremental energy rate (IER) from 1995 with a 24-month rolling average of “forward market prices for NP15 (for PG&E) or SP15 (for SCE and SDG&E).”<sup>1</sup> Both the “forward” and “historical” components of this formula are flawed and, together, generate prices that bear no relationship to the avoided cost of energy at the time of delivery. Further, this contorted and contrived approach to calculating SCE’s short-run avoided cost of energy (SRAC) at the time of delivery makes no sense at all, since the record amply supports the use of transparent, daily prices that are used to dispatch all of SCE’s dispatchable resources *the day before delivery*.

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<sup>1</sup> Alternate at 66.

For firm QFs, the pricing provisions in the Alternate will yield all-in prices that are higher than any of the pricing methodologies proposed in this proceeding – ***including even those proposed by the QF parties.***<sup>2</sup> Indeed, according to Table 7 of the Alternate, the pricing provisions in the Alternate will yield all-in prices that are 13% ***higher*** than would be produced by CAC/EPUC or IEP’s pricing proposals!<sup>3</sup>

The Alternate also imposes long-term contracting burdens on investor owned utility (IOU) bundled service customers that will not be shared by customers of other retail providers – compounding the inequity of the excessive pricing provisions in the Alternate. The imposition of mandatory long-term standard offer contracts will burden utility customers with a disproportionate share of costs and may produce stranded costs. It is essential that the Commission correct the errors in avoided cost pricing in order to avoid stranded costs.

Moreover, the Commission should limit the availability of any new standard offer contracts to QFs with a net capacity no greater than 20 MW to decrease the risk of oversubscription. Such a cap is consistent with FERC’s recently-adopted regulations implementing the Public Utility Regulatory Policies Act of 1978<sup>4</sup> (PURPA). The Alternate fails to provide any protection against oversubscription and creates a significant risk of another QF “gold rush.” Therefore, SCE respectfully requests that the Commission reject the Alternate.

## **I.**

### **THE ENERGY PAYMENT FORMULA ADOPTED IN THE ALTERNATE YIELDS PRICES THAT EXCEED SCE’S AVOIDED COST**

PURPA and FERC’s regulations implementing PURPA provide that utilities can only be compelled to purchase power from QFs at rates that do not exceed the utility’s avoided cost.<sup>5</sup> Avoided cost is defined as “the incremental cost to an electric utility of electric energy or capacity or both which, but for the purchase from the qualifying facility or qualifying facilities,

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<sup>2</sup> See *id.* at 98, Table 7.

<sup>3</sup> See *id.*

<sup>4</sup> Pub.L. No. 95-617 (Nov. 9, 1978), *codified in part at* 16 U.S.C. § 824a-3 *et seq.*

<sup>5</sup> See 18 C.F.R. § 292.304(a)(2) (“Nothing in this subpart requires any electric utility to pay more than the avoided costs for purchases.”); *see also* 16 U.S.C. § 824a-3(b) (“No [] rule . . . shall provide for a rate which exceeds the incremental cost to the electric utility of alternative electric energy.”).

such utility would generate itself or purchase from another source.”<sup>6</sup> “[I]n calculating avoided cost rates for QF power, state authorities must determine the cost the utility avoided by considering the cost of *all alternative sources of power* available to the utility . . . .”<sup>7</sup> “The essence of avoided cost pricing is that *payments to the QF should reflect the payments that would have been made* to the sources of power that were displaced by the QF, that is, the costs avoided by purchasing QF power.”<sup>8</sup>

SP-15 day-ahead prices are the best measure of the short-run energy cost avoided by SCE though purchases of QF energy, *i.e.* SCE’s short-run avoided cost of energy under PURPA. It is undisputed that SCE dispatches all of its resources that can be dispatched – *i.e.*, that are avoidable – based on the SP-15 day-ahead market price,<sup>9</sup> in accordance with the Commission’s least-cost dispatch protocols.<sup>10</sup> It is also undisputed that the SP-15 day-ahead market is the *actual market* that SCE uses to buy and sell short-run energy.<sup>11</sup> Indeed, the QF parties’ own witnesses confirmed<sup>12</sup> that SP-15 day-ahead energy is “the source[] of power that [is] displaced . . . by purchasing QF power.”<sup>13</sup>

Nevertheless, the Alternate inexplicably rejects using day-ahead market prices for calculating SRAC energy payments and, instead, calculates SRAC energy payments using a formula that blends an IER value that is 12 years old with a 24-month rolling average of

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<sup>6</sup> 18 C.F.R. § 292.101(b)(6); *see also* 16 U.S.C. § 824a-3(d).

<sup>7</sup> *S. Cal. Edison Co.*, 71 FERC ¶ 61,269, 62,080 (1995) (*BRPU II*) (*emphasis added*); *see also N. Little Rock Cogeneration, L.P. v. Entergy Serv., Inc.*, 72 FERC ¶ 61,263, 62,173 (1995) (“Avoided costs are determined, in the first instance, by all alternatives available to the purchasing utility.”).

<sup>8</sup> *Administrative Determination of Full Avoided Costs, Sales of Power to Qualifying Facilities, and Interconnection Facilities*, FERC Stat. & Reg. ¶ 32,457, 32,163 (1988).

<sup>9</sup> *See* SCE Opening Testimony, Ex. 1 at 41:20-45:7.

<sup>10</sup> *See* D.02-10-062 at 52; D.02-12-074 at 54.

<sup>11</sup> *See* SCE Opening Testimony, Ex. 1 at 41:1-45:7; QF/Cavicchi, Tr. Vol. 22 at 3216:8-12, 3217:1-10, 3218:2-3219:4 (if SCE were to learn today that a QF was going to shut down tomorrow for a maintenance outage, SCE would have to purchase replacement power at a price no greater than the SP-15 day-ahead market price); CCC/Beach, Tr. Vol. 27 at 3986:22-3987:4 (if PG&E had too much power, it would sell it into the NP-15 day-ahead market).

<sup>12</sup> *See* QF/Cavicchi, Tr. Vol. 22 at 3216:8-12, 3217:1-10, 3218:2-3219:4; CCC/Beach, Tr. Vol. 27 at 3986:22-3987:8, 4015:21-25.

<sup>13</sup> *Administrative Determination of Full Avoided Costs, Sales of Power to Qualifying Facilities, and Interconnection Facilities*, FERC Stat. & Reg. ¶ 32,457, 32,163.

“forward market prices for NP15 (for PG&E) or SP15 (for SCE and SDG&E).”<sup>14</sup> It is difficult to conceive of a methodology that is less tied to the avoided cost of energy at the time of delivery.

As discussed below, the Alternate’s rejection of day-ahead market prices for SRAC energy payments is baseless and both the “forward” and “historical” components of the Alternate’s SRAC payment formula are flawed and yield prices that exceed SCE’s avoided cost. Therefore, the Commission should reject the Alternate and adopt the SRAC energy pricing methodology proposed by SCE in this proceeding.

**A. THE ALTERNATE’S REJECTION OF DAY-AHEAD MARKET PRICES FOR SRAC ENERGY PAYMENTS IS BASELESS**

The Alternate rejects day-ahead market prices for calculating SRAC energy payments and, instead, calculates SRAC energy payments using a formula that blends an IER from 1995 with a 24-month rolling average of “forward market prices for NP15 (for PG&E) or SP15 (for SCE and SDG&E).”<sup>15</sup> More specifically, the Alternate adopts a Market Index Formula (MIF) that calculates QF energy payments by multiplying a heat rate by a gas price and adding an operations & maintenance (O&M) adder. According to the Alternate, “[t]he IER or heat rate in the MIF shall be calculated by taking an average between an NP15/SP15-derived value . . . and the existing administratively determined heat rates pursuant to D.96-12-028.”<sup>16</sup> “In calculating the market heat rate using NP15/SP15 indices, rather than using historical prices, we will use a 24-month rolling average of the weighted average price of the forward market prices for NP15 (for PG&E) or SP15 (for SCE and SDG&E).”<sup>17</sup>

The Alternate rejects using only forward or day-ahead market prices for SRAC energy payments on the grounds that these markets are easily manipulated and reflect only lower cost

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<sup>14</sup> Alternate at 66.

<sup>15</sup> *Id.*

<sup>16</sup> *Id.*

<sup>17</sup> *Id.*

products.”<sup>18</sup> According to the Alternate, NP-15 and SP-15 prices “likely understate utility avoided costs” due to their “failure to reflect out-of-market transactions” such as RMR and must-offer obligation (MOO) costs.<sup>19</sup> The Alternate also claims that the utilities are able to manipulate these market prices by underscheduling.<sup>20</sup> These claims are unsupported by the record and offer no justification for failing to adopt day-ahead market prices for SRAC energy payments.

As discussed above, PURPA defines the SRAC energy so as to include only those costs that can *actually* be avoided by additional purchases of QF energy. The record in this proceeding clearly establishes that the costs of RMR and MOO generation are not avoidable *energy* costs – they are payments for *capacity*.<sup>21</sup> Accordingly, these costs are not and cannot be avoided by additional short-run QF energy and are not a component of SRAC. Indeed, CCC witness Beach plainly admitted that RMR fixed option payments, the largest component of RMR payments, “aren’t avoided by additional short-run QF energy . . . . It’s not an avoided energy cost.”<sup>22</sup>

The Alternate’s claim that the utilities may manipulate market prices by underscheduling is sheer speculation that has no basis in the record. It is undisputed that the utilities cannot lawfully engage in intentional underscheduling. As QF parties witness Cavicchi explained, “Amendment 72 *requires* load serving entities or scheduling coordinators to submit day-ahead schedules that are at least 95 percent [of] forecasted hourly demand . . . .”<sup>23</sup> Furthermore, “Amendment 72 also allows the ISO to assess compliance with th[e] 95 percent requirement . . . and can report violations to FERC[.]”<sup>24</sup> There is no basis for assuming that the utilities will intentionally violate federal tariffs to drive down SRAC payments to QFs. Thus, the Alternate’s

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<sup>18</sup> *Id.* at 61.

<sup>19</sup> *Id.*

<sup>20</sup> *See id.*

<sup>21</sup> *See* SCE/Silsbee, Tr. Vol. 19 at 2699:23-26 (“[T]he process of RMR is to get the *capacity* into the market in that local area . . . .”); PG&E/Coffee, Tr. Vol. 24 at 3496:1-3; QF/Cavicchi, Tr. Vol. 22 at 3243:10-17 (the ISO issues must-offer waiver denials “for system capacity needs . . . .”); Ex. 49 at p. 8, 11.

<sup>22</sup> CCC/Beach, Tr. Vol. 29 at 4186:15-18.

<sup>23</sup> QF/Cavicchi, Tr. Vol. 22 at 3211:12-16 (*emphasis added*); *see also* Exs. 45 and 46.

<sup>24</sup> QF/Cavicchi, Tr. Vol. 22 at 3211:17-22; *see also* Exs. 45 and 46.

rejection of day-ahead market prices for SRAC energy payments is completely unfounded and unsupported by the record.

**B. THE “FORWARD” COMPONENT OF THE MIF YIELDS PRICES THAT EXCEED SCE’S AVOIDED COST**

As discussed above, the Alternate provides that “[t]he IER or heat rate in the MIF shall be calculated by taking an average between an NP15/SP15-derived value . . . and the existing administratively determined heat rates pursuant to D.96-12-028.”<sup>25</sup> “In calculating the market heat rate using NP15/SP15 indices, rather than using historical prices, we will use a 24-month rolling average of the weighted average price of the forward market prices for NP15 (for PG&E) or SP15 (for SCE and SDG&E).”<sup>26</sup>

The forward price calculation proposed in the Alternate was not proposed by any party, and the methodology is so vague and unclear as to be impossible to replicate or implement. In order to perform the calculation proposed in Table 3 of the Alternate, future prices through December of 2011 are necessary. However, Table 3 does not provide any pricing data for 2010 or 2011. Even with respect to the data for 2007 through 2009, it is unclear what sources were used. Table 3 refers to “SP-15 Monthly Avg. of DJ, ICE and MWDaily” as sources for input data.<sup>27</sup> However, these publications do not supply two years of electricity forward prices. In addition, Table 3 fails to specify whether the “forward” prices are from a particular trade date or multiple trade dates.

The source of the natural gas pricing data is similarly unclear. According to Table 3, the Alternate has illogically mixed “forward” prices for electricity with “Topock CA Bidweek” prices for natural gas, instead of using forward prices for natural gas. Further, SCE is not aware of any transparent market that would yield forward prices for “SoCal Gas Intrastate Transportation.”

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<sup>25</sup> Alternate at 66.

<sup>26</sup> *Id.*

<sup>27</sup> *Id.* at Table 3.



Table 3a is even more confusing. Table 3a purports to test how the forward price calculation proposed in the Alternate would have performed historically.<sup>28</sup> Table 3a claims to have calculated 24-month averages of *forward* heat rates from August of 2002 to May of 2007.<sup>29</sup> In fact, it appears that Table 3a used *actual day-ahead* SP-15 prices, *actual bidweek* gas prices, and *actual* SoCalGas transportation to calculate the 24-month heat rate averages.<sup>30</sup> Thus, it is entirely unclear whether the calculation proposed in the Alternate can even be implemented and, if so, how.

Moreover, unlike the day-ahead indices, which are highly liquid, forward prices are substantially less liquid, particularly after the first 12 months. SCE's SRAC methodology, which uses 12-month historical SP-15 day-ahead prices, relies on transparent data from a well-functioning market<sup>31</sup> that SCE actually uses to dispatch resources.<sup>32</sup> The Alternate dismisses concerns regarding the liquidity of forward prices for a 24-month period without explanation, simply stating that "we believe that SRAC prices based on historical market prices would not best reflect utility avoided cost."<sup>33</sup> Interestingly, one of the principal criticisms leveled at SCE's approach to calculating SRAC was that the day-ahead market lacks sufficient volume to serve as a legitimate determinant for SRAC. Although this criticism is not well-founded, it must be noted that the forward market is substantially less liquid than the SP-15 day-ahead market and, particularly after the first 12 months, reported forward prices may not represent actual transactions but, instead, may represent broker quotes or estimates of forward prices.

Furthermore, the forward price calculation proposed in the Alternate does not calculate short-run avoided cost "at the time of delivery," as required by PURPA.<sup>34</sup> It is undisputed that

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<sup>28</sup> See *id.* at Table 3a.

<sup>29</sup> See *id.*

<sup>30</sup> The calculation in Table 3a is more similar to SCE's day-ahead methodology than it is to a forward-price methodology.

<sup>31</sup> See Ex. 48 at 2-15 (CAISO 2004 Annual Report on Market Issues and Performance) (concluding that, "[o]n the whole, 2004 short-term forward markets functioned effectively, leading largely to competitive pricing in both the NP15 and SP15 regions."); see also QF/Cavicchi, Tr. Vol. 22 at 3236:22-27, 3238:5-7.

<sup>32</sup> See SCE Opening Testimony, Ex. 1 at 41:20-45:7.

<sup>33</sup> Alternate at 65.

<sup>34</sup> See 18 C.F.R. § 292.304(d)(2).

forward market prices contain capacity value.<sup>35</sup> Both QF parties witness Cavicchi and CCC witness Beach conceded that forward market prices included more than just the value of energy.<sup>36</sup> And the capacity value included in market prices can be significant. In its 2004 report, the California Independent System Operator's (CAISO) Department of Market Analysis reported that "[a] new combustion turbine unit selling solely into the CAISO imbalance energy and non-spinning reserve markets in 2003 would have received a net revenue in the range of approximately . . . \$36/kW-year for . . . SP15 . . . . In 2004, the net revenue for the combustion turbine unit was . . . significantly higher in SP15 at \$45/kW-year."<sup>37</sup> By using these forward prices, the SRAC payment formula adopted in the Alternate double-pays for capacity, thus yielding pricing that exceed SCE's avoided cost. Therefore, the Alternate should be rejected.

**C. THE "HISTORICAL" COMPONENT OF THE MIF YIELDS PRICES THAT EXCEED SCE'S AVOIDED COST**

Due to its erroneous rejection of day-ahead market prices for SRAC energy payments, the Alternate concludes that SRAC energy payments should be calculated using a formula that blends SCE's 1995 IER of 9,140 Btu/kWh with a 24-month rolling average of "forward market prices." The Alternate claims that the 9,140 Btu/kWh historical IER "corrects for the failure of the existing markets to reflect the full cost of the total generation mix available in California."<sup>38</sup> This claim has no basis in fact or in the record.

The Section 390(b) transition formula for determining SRAC, which was adopted by the Commission in D.96-12-028, as later modified in D.01-03-067, "uses a static IER of 9,140 Btu/kWh, derived from an average of such values for 1995."<sup>39</sup> It is beyond dispute that this

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<sup>35</sup> See SCE Rebuttal Testimony, Ex. 2 at 73.

<sup>36</sup> See QF/Cavicchi, Tr. Vol. 22 at 3231:3-7 ("Q So would you agree there's at least some capacity value in the energy prices? A I believe that there's some contribution of fixed costs that can be obtained by an appropriately efficient resource through the energy markets."); Prepared Opening Testimony of R. Thomas Beach on behalf of the California Manufacturers and Technology Association and the Indicated Commercial Parties, Ex. 106.

<sup>37</sup> Ex. 48 at 2-29.

<sup>38</sup> Alternate at 66.

<sup>39</sup> SCE Opening Testimony, Ex. 1 at 32:9-10.

formula was intended as a transitional measure until SRAC energy payments QF pricing could transition to Power Exchange market pricing.<sup>40</sup> Now over ten years later, it is clear that there will be no transition. The decade-old transition formula and IER value are out-of-date and bear no relationship to today's electricity market.<sup>41</sup> As PG&E witness Lauckhart explained, the heat rate in the SRAC transition formula is "a pretty old, established value that hasn't been updated for quite a long time."<sup>42</sup> In 2002, the Commission itself acknowledged that the transition formula was out-of-date. The Section 390(b) formula has now "been in place for over 4 years. *It would be unreasonable to believe that this interim formula would still accurately reflect current utility avoided costs.*"<sup>43</sup>

It is now even more unreasonable to believe that a 1995 IER value would have any relationship to the current "alternative sources of power available to the utility . . . ."<sup>44</sup> Indeed, PG&E witness Lauckhart plainly stated that the "heat rate [in the transition formula] . . . do[es]n't have current contact with the market . . . ."<sup>45</sup> Thus, the Alternate's use of SCE's 1995 IER of 9,140 Btu/kWh in the MIF generates prices that bear no relationship to the avoided cost of energy at the time of delivery.

Moreover, SCE submitted extensive evidence demonstrating that the transition formula consistently yields prices that exceed SP-15 day-ahead market prices.<sup>46</sup> Moreover, for firm QFs, the pricing provisions in the Alternate will yield all-in prices that are higher than any of the pricing methodologies proposed in this proceeding – including those proposed by the QF parties.<sup>47</sup> Indeed, according to Table 7 of the Alternate, the pricing provisions in the Alternate will yield all-in prices that are 13% *higher* than would be produced by CAC/EPUC or IEP's

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<sup>40</sup> See Cal. Pub. Util. Code § 390(c).

<sup>41</sup> See PG&E/Lauckhart Tr. Vol. 25 at 3651:18-20.

<sup>42</sup> *Id.* at 3651:26-3652:3.

<sup>43</sup> D.02-02-028 at 12 (*emphasis added*).

<sup>44</sup> *BRPU II*, 71 FERC at 62,080.

<sup>45</sup> PG&E/Lauckhart Tr. Vol. 25 at. at 3653:18-19.

<sup>46</sup> SCE Opening Testimony, Ex. 1 at 56:1-60:4.

<sup>47</sup> See Alternate at 98, Table 7.

pricing proposals.<sup>48</sup> Thus, the Alternate's SRAC payment formula yields prices that exceed SCE's avoided cost. The Alternate should, therefore, be rejected.

## II.

### **THE FIRM CAPACITY PRICE ADOPTED IN THE ALTERNATE EXCEEDS SCE'S AVOIDED COST**

The Alternate adopts a firm capacity price of \$135.97/kW-yr based on the \$156.97/kW-yr capacity price used for the 2006 market price referent (MPR), less \$21.00/kW-yr of "savings gained from running in the energy market (inframarginal rents)."<sup>49</sup> The \$135.97/kW-yr capacity price significantly overpays for capacity because it fails to deduct an adequate amount for savings gained from running in the energy market and fails to adjust for the residual value of the MPR proxy unit as a result of having an operating life greater than 20 years. To properly reflect SCE's avoided cost of capacity, the \$156.97/kW-yr MPR capacity price used in the Alternate should be reduced by at least \$55/kW-yr to account for savings gained from running in the energy market and by an additional \$10/kW-yr to account for residual value, yielding a firm capacity price no greater than \$91.97/kW-yr.

As discussed above, the Alternate adopts a firm capacity price based on the \$156.97/kW-yr capacity price used for the 2006 MPR, less \$21.00/kW-yr of savings gained from running in the energy market.<sup>50</sup> The Alternate recognizes that the MPR proxy unit is an energy-efficient combined-cycle gas turbine that will realize significant energy savings from running in the energy market.<sup>51</sup> However, the \$21.00/kW-yr deduction in the Alternate does not adequately reflect the energy savings associated with the unit. The CAISO's Department of Market Analysis calculated that a new combined-cycle gas turbine would have earned \$58/kW-yr for selling its output in SP-15 during 2003 and \$55/kW-yr for selling its output in SP-15 during

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<sup>48</sup> See *id.*

<sup>49</sup> Alternate at 97.

<sup>50</sup> See *id.*

<sup>51</sup> See *id.* at 94, 97.

2004.<sup>52</sup> The \$156.97/kW-yr MPR capacity price used in the Alternate should, therefore, be reduced by at least \$55/kW-yr to account for savings gained from running in the energy market.

In addition, the \$156.97/kW-yr MPR capacity price used in the Alternate fails to adjust for the residual value of the MPR proxy unit as a result of having an operating life greater than 20 years. The \$156.97/kW-yr capacity price used for the 2006 MPR annualizes the capital cost of the MPR proxy unit over a 20-year term.<sup>53</sup> Annualizing the capital cost of the unit over a 20-year term, instead of a 30-year economic/operating life, overstates capacity value by approximately \$10/kW-yr.<sup>54</sup>

The appropriate life-cycle of the combined-cycle gas turbine proxy should be 30 years, not 20 years. “[M]any of SCE’s former gas-fired peaking facilities have operated beyond the 30-year anniversary of their in-service dates.”<sup>55</sup> “For example, the following Southern California natural gas peaking facilities were retired after more than 30 years of operating service: Alamitos Unit 7 (34 years), Etiwanda Unit 5 (35 years), and Huntington Beach Unit 5 (34 years). Furthermore, the following peakers are currently in operation: Elwood (built in 1974) and Mandalay Unit 3 (built in 1970).”<sup>56</sup> In addition, “SCE’s own CTs at Mountainview [were] approved by the Commission based on an assumed 30-year economic/operating life.”<sup>57</sup>

Even the combustion turbine capacity values that were proposed by TURN, and adopted by the Alternate for “as-available” capacity pricing, are based on an economic life greater than 20 years. As TURN witness Marcus explained, “I used a 25-year book and economic life for the combustion turbine. SDG&E’s RAMCO CT has a 25 year depreciable life . . . .”<sup>58</sup>

Annualizing full capital cost recovery of a combined-cycle gas turbine over a 20-year term, instead of a 30-year economic/operating life, results in a higher capacity cost and fails to

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<sup>52</sup> See Ex. 48 at 2-27–2-30 (CAISO 2004 Annual Report on Market Issues and Performance).

<sup>53</sup> See E-4049, Appx. E.

<sup>54</sup> See SCE Rebuttal Testimony, Ex. 2 at 71-72.

<sup>55</sup> *Id.* at 71.

<sup>56</sup> *Id.* at 71 n.76.

<sup>57</sup> *Id.* at 71.

<sup>58</sup> TURN Opening Testimony, Ex. 149 at B-3.

account for the “residual value” of the combined-cycle gas turbine after 20 years.<sup>59</sup> Table V-3 in SCE’s rebuttal testimony provides several examples that quantify this residual value.<sup>60</sup> Overall, the residual value associated with a 20-year term is approximately \$10/kW-yr.<sup>61</sup> Therefore, the firm capacity price in the Alternate should be reduced by an additional \$10/kW-yr to account for the residual value of the combined-cycle gas turbine proxy. In total, the \$156.97/kW-yr MPR capacity price used in the Alternate should be reduced by at least \$55/kW-yr to account for savings gained from running in the energy market and by an additional \$10/kW-yr to account for residual value, yielding a firm capacity price no greater than \$91.97/kW-yr.

### **III.**

#### **THE NEW STANDARD OFFER CONTRACTS IN THE ALTERNATE SHOULD BE REJECTED**

As SCE discussed in detail in its comments on the proposed decision of ALJ Halligan (Halligan PD), standard offer contracts are *not* required by PURPA, nor are must-take obligations of any particular duration.<sup>62</sup> Like the Halligan PD, the Alternate imposes long-term contracting burdens on IOU bundled service customers that will not be shared by customers of other retail providers, will burden utility customers with a disproportionate share of costs and may produce stranded costs.<sup>63</sup> However, the Alternate compounds these inequities by requiring a third standard offer contract option for new QFs under 25 MW “without an oversubscription limitation.”<sup>64</sup> Such a requirement is inconsistent with federal law and should be rejected.

PURPA does not require utilities to buy capacity that they do not need to serve load.<sup>65</sup> Although “[a] qualifying facility may seek to have a utility purchase more energy or capacity than the utility requires to meet its total system load[,] . . . the purchase rate should only include payment for energy or capacity which the utility can use to meet its total system load.”<sup>66</sup>

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<sup>59</sup> See SCE Rebuttal Testimony, Ex. 2 at 71-72, 75.

<sup>60</sup> See *id.* at 75.

<sup>61</sup> *Id.* at 72, 75.

<sup>62</sup> Southern California Edison Company’s (U 338-E) Comments on Proposed Decision of ALJ Halligan at 3-5.

<sup>63</sup> SCE’s comments on the Halligan PD are equally applicable to the Alternate. SCE does not repeat those comments here but, instead, incorporates them by this reference. See *id.*

<sup>64</sup> Alternate at 2.

<sup>65</sup> See *City of Ketchikan, Alaska*, 94 FERC ¶ 61,293, 62,061-62,062 (2001); *FERC Order No. 69*, FERC Stat. & Reg. ¶ 30,128, 30,870 (1980).

<sup>66</sup> *Id.* at 62,062.

Ordering the utilities to purchase QF power regardless of need exceeds the Commission's jurisdiction under PURPA.<sup>67</sup>

To remedy this error, the Commission should limit the availability of any new standard offer contracts to QFs with a net capacity no greater than 20 MW. A 20 MW cap is consistent with FERC's recently-adopted PURPA regulations, in which FERC "a rebuttable presumption that the requirement that an electric utility enter into new contracts or obligations to purchase from a QF remains in effect, in all markets, for QFs sized 20 MW net capacity or smaller."<sup>68</sup> FERC determined that QFs larger than 20 MW have greater access to wholesale power markets and, based on that determination, adopted regulations that distinguish between QFs sized 20 MW or smaller and QFs larger than 20 MW for the purposes of relief from the PURPA must-take obligation.<sup>69</sup> Therefore, the Commission should reject the Alternate's standard offer contract option for new QFs under 25 MW and should limit the availability of any new standard offer contracts to QFs with a net capacity no greater than 20 MW to decrease the risk of oversubscription.

#### IV.

#### **THE ALTERNATE COMMITS LEGAL ERROR** **IN FAILING TO ORDER A RETROACTIVE TRUE-UP OF SRAC ENERGY PRICES**

The Alternate states that "this decision updates the methodology for calculating SRAC energy prices *on a prospective basis only*, to ensure that SRAC prices continue to reflect utility avoided cost in the changing electricity markets in California."<sup>70</sup> The Alternate states that "the record in this proceeding does not support a conclusion that the [SRAC transition formula] yielded prices that exceed utility avoided cost or systematically violated PURPA."<sup>71</sup> This simply ignores the record in this proceeding.

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<sup>67</sup> See *id.* at 62,063 n.18 (2001) ("A utility cannot lawfully be compelled to enter contracts that would be inconsistent with PURPA."); *BRPU I*, 70 FERC at 61,677.

<sup>68</sup> *New PURPA Section 210 (m) Regulations Applicable To Small Power Production and Cogeneration Facilities*, 117 FERC ¶ 61,078, ¶ 72 (2006).

<sup>69</sup> See *id.*

<sup>70</sup> Alternate at 9 (*emphasis added*).

<sup>71</sup> *Id.* at 10.

As discussed above, the transition formula has lacked any relationship to the current electricity market for many years. The evidence of record clearly demonstrates that, for many years, the SRAC transition formula currently in place has consistently yielded prices in excess of avoided cost.<sup>72</sup> Indeed, the Commission itself has acknowledged that “It would be unreasonable to believe that this interim formula would still accurately reflect current utility avoided costs.”<sup>73</sup> The Court of Appeal has expressly held that, under these circumstances, the Commission has the duty to order retroactive adjustment of SRAC prices.<sup>74</sup> Therefore, the Commission must order a retroactively true-up of SRAC energy prices.

V.

**CONCLUSION**

For the foregoing reasons, SCE respectfully requests that the Commission reject the Alternate.

Respectfully submitted,

MICHAEL MONTOYA  
BERJ K. PARSEGHIAN

*/s/ Berj K. Parseghian*

By: Berj K. Parseghian

Attorneys for  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770  
Telephone: (626) 302-3102  
Facsimile: (626) 302-1904  
E-mail: Berj.Parseghian@sce.com

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<sup>72</sup> SCE Opening Testimony, Ex. 1 at 56:1-60:4.

<sup>73</sup> D.02-02-028 at 12 (*emphasis added*).

<sup>74</sup> See *S. Cal. Edison Co. v. Cal. P.U.C.*, 128 Cal. App. 4th 1, 12 (2005); *S. Cal. Edison Co. v. Cal. P.U.C.*, 101 Cal. App. 4th 982, 999 (2002).



**CERTIFICATE OF SERVICE**

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) COMMENTS ON ALTERNATE PROPOSED DECISION OF COMMISSIONER GRUENEICH on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

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Executed this **10th day of September, 2007**, at Rosemead, California.

/s/ Raquel Ippoliti

Raquel Ippoliti  
Project Analyst  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770

**R.04-04-003**

Monday, September 10, 2007

ABBAS M. ABED  
ASSOCIATE DIRECTOR  
NAVIGANT CONSULTING, INC.  
402 WEST BROADWAY, SUITE 400  
SAN DIEGO, CA 92101  
R.04-04-003

KENNETH E. ABREU  
853 OVERLOOK COURT  
SAN MATEO, CA 94403  
R.04-04-003

CASE ADMINISTRATION  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770  
R.04-04-003

STACY AGUAYO  
APS ENERGY SERVICES  
400 E. VAN BUREN STREET, SUITE 750  
PHOENIX, AZ 85004  
R.04-04-003

MICHAEL ALCANTAR  
ATTORNEY AT LAW  
ALCANTAR & KAHL LLP  
1300 SW FIFTH AVENUE, SUITE 1750  
PORTLAND, OR 97201  
R.04-04-003

STANLEY I. ANDERSON  
POWER VALUE INCORPORATED  
964 MOJAVE CT  
WALNUT CREEK, CA 94598  
R.04-04-003

SCOTT J. ANDERS  
RESEARCH/ADMINISTRATIVE DIRECTOR  
UNIVERSITY OF SAN DIEGO SCHOOL OF  
LAW  
5998 ALCALA PARK  
SAN DIEGO, CA 92110  
R.04-04-003

FRANK ANNUNZIATO  
PRESIDENT  
AMERICAN UTILITY NETWORK INC.  
10705 DEER CANYON DR.  
ALTA LOMA, CA 91737-2483  
R.04-04-003

ROD AOKI  
ATTORNEY AT LAW  
ALCANTAR & KAHL, LLP  
120 MONTGOMERY STREET, SUITE 2200  
SAN FRANCISCO, CA 94104  
R.04-04-003

OSA ARMI  
ATTORNEY AT LAW  
SHUTE MIHALY & WEINBERGER LLP  
396 HAYES STREET  
SAN FRANCISCO, CA 94102  
R.04-04-003

JEANNE B. ARMSTRONG  
RITCHIE & DAY, LLP  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA 94111  
R.04-04-003

JESUS ARREDONDO  
NRG ENERGY, INC.  
4600 CARLSBAD BLVD.  
CARLSBAD, CA 99208  
R.04-04-003

Nilgun Atamturk  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 5303  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

Kathryn Auriemma  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

PHILIPPE AUCLAIR  
11 RUSSELL COURT  
WALNUT CREEK, CA 94598  
R.04-04-003

MICHAEL A. BACKSTROM  
ATTORNEY AT LAW  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770  
R.04-04-003

CAROLYN A. BAKER  
ATTORNEY AT LAW  
7456 DELTAWIND DRIVE  
SACRAMENTO, CA 95831  
R.04-04-003

GEORGETTA J. BAKER  
ATTORNEY AT LAW  
SAN DIEGO GAS & ELECTRIC/SOCAL GAS  
101 ASH STREET, HQ 13  
SAN DIEGO, CA 92101  
R.04-04-003

**R.04-04-003**

Monday, September 10, 2007

BARBARA R. BARKOVICH  
BARKOVICH & YAP, INC.  
44810 ROSEWOOD TERRACE  
MENDOCINO, CA 95460  
R.04-04-003

CARMEN E. BASKETTE  
CORPORATE DEVELOPMENT PRINCIPAL  
594 HOWARD ST., SUITE 400  
SAN FRANCISCO, CA 94105  
R.04-04-003

GREG BASS  
SEMPRA ENERGY SOLUTIONS  
101 ASH STREET. HQ09  
SAN DIEGO, CA 92101-3017  
R.04-04-003

TOM BEACH  
CROSSBORDER ENERGY  
2560 NINTH STREET, SUITE 213A  
BERKELEY, CA 94710-2557  
R.04-04-003

VALERIE BECK  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

ROGER BERLINER  
PRESIDENT  
BERLINER LAW PLLC  
1747 PENNSYLVANIA AVE. N.W., STE 825  
WASHINGTON, DC 20006  
R.04-04-003

C. SUSIE BERLIN  
ATTORNEY AT LAW  
MC CARTHY & BERLIN, LLP  
100 PARK CENTER PLAZA, SUITE 501  
SAN JOSE, CA 95113  
R.04-04-003

PEGGY BERNARDY  
CALIFORNIA DEPARTMENT OF WATER  
RESOURCES  
1416 9TH ST.  
SACRAMENTO, CA 95814-4409  
R.04-04-003

SARAH BESERRA  
CALIFORNIA REPORTS  
39 CASTLE HILL COURT  
VALLEJO, CA 94591  
R.04-04-003

SCOTT BLAISING  
ATTORNEY AT LAW  
BRAUN & BLAISING, P.C.  
915 L STREET, STE. 1270  
SACRAMENTO, CA 95814  
R.04-04-003

GREGORY T. BLUE  
ENXCO DEVELOPMENT CORP.  
5000 EXEXUTIVE PARKWAY, STE. 140  
SAN RAMON, CA 94583  
R.04-04-003

Traci Bone  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
5TH FLOOR  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

WILLIAM H. BOOTH  
ATTORNEY AT LAW  
LAW OFFICES OF WILLIAM H. BOOTH  
1500 NEWELL AVENUE, 5TH FLOOR  
WALNUT CREEK, CA 94596  
R.04-04-003

MICHAEL E. BOYD  
PRESIDENT  
CALIFORNIANS FOR RENEWABLE ENERGY,  
INC.  
5439 SOQUEL DRIVE  
SOQUEL, CA 95073  
R.04-04-003

Carol A Brown  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 5103  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

JUSTIN D. BRADLEY  
DIRECTOR  
SILICON VALLEY LEADERSHIP GROUP  
224 AIRPORT PARKWAY, SUITE 620  
SAN JOSE, CA 95110  
R.04-04-003

MATTHEW V. BRADY  
ATTORNEY AT LAW  
MATTHEW V. BRADY & ASSOCIATES  
2339 GOLD MEADOW WAY  
GOLD RIVER, CA 95670  
R.04-04-003

GREG BROWNELL  
SACRAMENTO MUNICIPAL UTILITY  
DISTRICT  
6201 S STREET, M.S. B306  
SACRAMENTO, CA 95817-1899  
R.04-04-003

**R.04-04-003**

Monday, September 10, 2007

ANDREW B. BROWN  
ATTORNEY AT LAW  
ELLISON, SCHNEIDER & HARRIS, LLP  
2015 H STREET  
SACRAMENTO, CA 95814  
R.04-04-003

LYNNE BROWN  
CALIFORNIANS FOR RENEWABLE ENERGY,  
INC.  
24 HARBOR ROAD  
SAN FRANCISCO, CA 94124  
R.04-04-003

MARGARET D. BROWN  
ATTORNEY AT LAW  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 7442  
SAN FRANCISCO, CA 94120-7442  
R.04-04-003

NINA BUBNOVA  
CASE MANAGER  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 770000, MAIL CODE B9A  
SAN FRANCISCO, CA 94177  
R.04-04-003

Eugene Cadenasso  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

MAURICE CAMPBELL  
MEMBER  
CALIFORNIANS FOR RENEWABLE ENERGY,  
INC.  
1100 BRUSSELS ST.  
SAN FRANCISCO, CA 94134  
R.04-04-003

DAN L. CARROLL  
ATTORNEY AT LAW  
DOWNEY BRAND LLP  
555 CAPITOL MALL, 10TH FLOOR  
SACRAMENTO, CA 95814  
R.04-04-003

SHERYL CARTER  
NATURAL RESOURCES DEFENSE COUNCIL  
111 SUTTER STREET, 20TH FLOOR  
SAN FRANCISCO, CA 94104  
R.04-04-003

LAUREN CASENTINI  
D & R INTERNATIONAL  
711 MAIN STREET  
HALF MOON BAY, CA 94019  
R.04-04-003

SEAN CASEY  
SAN FRANCISCO PUBLIC UTILITIES  
COMMISSIO  
1155 MARKET STREET, 4TH FLOOR  
SAN FRANCISCO, CA 94103  
R.04-04-003

Theresa Cho  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 5207  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

ED CHANG  
FLYNN RESOURCE CONSULTANTS, INC.  
2165 MOONSTONE CIRCLE  
EL DORADO HILLS, CA 95762  
R.04-04-003

WILLIAM H. CHEN  
CONSTELLATION NEW ENERGY, INC.  
ONE MARKET STREET  
SAN FRANCISCO, CA 94105  
R.04-04-003

BRIAN K. CHERRY  
DIRECTOR REGULATORY RELATIONS  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, B10C  
SAN FRANCISCO, CA 94106  
R.04-04-003

KRIS G. CHISHOLM  
CALIFORNIA ELECTRICITY OVERSIGHT  
BOARD  
770 L STREET, SUITE 1250  
SACRAMENTO, CA 95814  
R.04-04-003

HOWARD CHOY  
COUNTY OF LOS ANGELES  
1100 NORTH EASTERN AVENUE, ROOM 300  
LOS ANGELES, CA 90063  
R.04-04-003

G. ALAN COMNES  
WEST POWER CORP.  
3934 SE ASH STREET  
PORTLAND, OR 97214  
R.04-04-003

FRANK J. COOLEY  
ATTORNEY AT LAW  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770  
R.04-04-003

**R.04-04-003**

Monday, September 10, 2007

THOMAS CORR  
SEMPRA GLOBAL  
101 ASH STREET, HQ 08 C  
SAN DIEGO, CA 92101-3017  
R.04-04-003

LISA A. COTTLE  
ATTORNEY AT LAW  
WINSTON & STRAWN, LLP  
101 CALIFORNIA STREET, 39TH FLOOR  
SAN FRANCISCO, CA 94111  
R.04-04-003

RICHARD H. COUNIHAN  
SR. DIRECTOR CORPORATE  
DEVELOPMENT  
ENERNOC, INC.  
594 HOWARD ST., SUITE 400  
SAN FRANCISCO, CA 94105  
R.04-04-003

DAVID J. COYLE  
ANZA ELECTRIC COOPERATIVE, INC  
58470 HIGHWAY 371  
ANZA, CA 92539-1909  
R.04-04-003

BRIAN T. CRAGG  
ATTORNEY AT LAW  
GOODIN, MACBRIDE, SQUERI, RITCHIE &  
DAY  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA 94111  
R.04-04-003

HOLLY B. CRONIN  
STATE WATER PROJECT OPERATIONS DIV  
CALIFORNIA DEPARTMENT OF WATER  
RESOURCES  
3310 EL CAMINO AVE., LL-90  
SACRAMENTO, CA 95821  
R.04-04-003

MICHAEL A. CRUMLEY  
EL PASO CORPORATION  
2 NORTH NEVADA AVE.  
COLORADO SPRINGS, CO 80903  
R.04-04-003

SEBASTIEN CSAPO  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 770000  
SAN FRANCISCO, CA 94177  
R.04-04-003

THOMAS DARTON  
PILOT POWER GROUP, INC.  
9320 CHESAPEAKE DRIVE, SUITE 112  
SAN DIEGO, CA 92123  
R.04-04-003

DYLE L. DAVIS  
PACIFICORP  
825 NE MULTNOMAH STREET  
PORTLAND, OR 97232  
R.04-04-003

STACEY DAVIS  
MANAGER, DOMESTIC PROGRAMS  
CENTER FOR CLEAN AIR POLICY  
750 FIRST STREET, NE  
WASHINGTON, DC 20002  
R.04-04-003

Matthew Deal  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

FERNANDO DE LEON  
ATTORNEY AT LAW  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET, MS-14  
SACRAMENTO, CA 95814-5512  
R.04-04-003

LISA DECKER  
COUNSEL  
CONSTELLATION ENERGY GROUP, INC.  
111 MARKET PLACE, SUITE 500  
BALTIMORE, MD 21202  
R.04-04-003

BRIAN DELAMER  
CAPSTONE TURBINE CORPORATION  
21211 NORDHOFF STREET  
CHATSWORTH, CA 91311  
R.04-04-003

RALPH E. DENNIS  
DIRECTOR, REGULATORY AFFAIRS  
FELLON-MCCORD & ASSOCIATES  
9960 CORPORATE CAMPUS DRIVE, STE  
2000  
LOUISVILLE, KY 40223  
R.04-04-003

Elizabeth Dorman  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 4300  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

Paul Douglas  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

**R.04-04-003**

Monday, September 10, 2007

LORI ANNE DOLQUEIST  
ATTORNEY AT LAW  
STEEFEL, LEVITT & WEISS  
ONE EMBARCADERO CENTER, 30TH FLOOR  
SAN FRANCISCO, CA 94111  
R.04-04-003

DANIEL W. DOUGLASS  
ATTORNEY AT LAW  
DOUGLASS & LIDDELL  
21700 OXNARD STREET, SUITE 1030  
WOODLAND HILLS, CA 91367  
R.04-04-003

DANIELLE DOWERS  
SAN FRANCISCO PUBLIC UTILITIES  
COMMISSION  
1155 MARKET STREET 4TH FLOOR  
SAN FRANCISCO, CA 94103  
R.04-04-003

KEVIN DUGGAN  
CALPINE COPORATION  
3875 HOPYARD ROAD, SUITE 345  
PLEASANTON, CA 94588  
R.04-04-003

PIERRE H. DUVAIR  
CALIFORNIA ENERGY COMMISSION  
1516 NINTH STREET, MS-41  
SACRAMENTO, CA 95814  
R.04-04-003

Robert Elliott  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

RICHARD D. ELY  
DAVIS HYDRO  
27264 MEADOWBROOK DRIVE  
DAVIS, CA 95618  
R.04-04-003

SAEED FARROKHPAY  
FEDERAL ENERGY REGULATORY  
COMMISSION  
110 BLUE RAVINE RD., SUITE 107  
FOLSOM, CA 95630  
R.04-04-003

DIANE I. FELLMAN  
ATTORNEY AT LAW  
FPL ENERGY, LLC  
234 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102  
R.04-04-003

Julie A. Fitch  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 5119  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

LAW DEPARTMENT FILE ROOM  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 7442  
SAN FRANCISCO, CA 94120-7442  
R.04-04-003

CENTRAL FILES  
SAN DIEGO GAS & ELECTRIC  
8330 CENTURY PARK COURT, CP31E  
SAN DIEGO, CA 92123  
R.04-04-003

Thomas Flynn  
CALIF PUBLIC UTILITIES COMMISSION  
770 L STREET, SUITE 1050  
SACRAMENTO, CA 95814  
R.04-04-003

MICHEL PETER FLORIO  
ATTORNEY AT LAW  
THE UTILITY REFORM NETWORK  
711 VAN NESS AVENUE, SUITE 350  
SAN FRANCISCO, CA 94102  
R.04-04-003

BARRY R. FLYNN  
FLYNN RESOURCE CONSULTANTS, INC.  
5440 EDGEVIEW DRIVE  
DISCOVERY BAY, CA 94514  
R.04-04-003

RYAN FLYNN  
PACIFICORP  
825 NE MULTNOMAH STREET, 18TH FLOOR  
PORTLAND, OR 97232  
R.04-04-003

STACIE FORD  
CALIFORNIA ISO  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630  
R.04-04-003

BETH A. FOX  
ATTORNEY AT LAW  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVENUE, GO1, ROOM  
351C  
ROSEMEAD, CA 91770  
R.04-04-003

**R.04-04-003**

Monday, September 10, 2007

KEVIN T. FOX  
WILSON SONSINI GOODRICH AND ROSATI  
ONE MARKET, SPEAR TOWER  
SAN FRANCISCO, CA 94105-1126  
R.04-04-003

BRETT FRANKLIN  
CALIFORNIA ELECTRICITY OVERSIGHT  
BOARD  
770 L STREET, SUITE 1250  
SACRAMENTO, CA 95814  
R.04-04-003

MATTHEW FREEDMAN  
ATTORNEY AT LAW  
THE UTILITY REFORM NETWORK  
711 VAN NESS AVENUE, SUITE 350  
SAN FRANCISCO, CA 94102  
R.04-04-003

SUSAN FREEDMAN  
SAN DIEGO REGIONAL ENERGY OFFICE  
8520 TECH WAY, SUITE 110  
SAN DIEGO, CA 92123  
R.04-04-003

Jack Fulcher  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

JOHN C. GABRIELLI  
GABRIELLI LAW OFFICE  
430 D STREET  
DAVIS, CA 95616  
R.04-04-003

JOHN GALLOWAY  
UNION OF CONCERNED SCIENTISTS  
2397 SHATTUCK AVENUE, SUITE 203  
BERKELEY, CA 94704  
R.04-04-003

DONALD P. GARBER  
ATTORNEY AT LAW  
SEMPRA ENERGY  
101 ASH STREET  
SAN DIEGO, CA 92101  
R.04-04-003

DAN GEIS  
THE DOLPHIN GROUP  
925 L STREET, SUITE 800  
SACRAMENTO, CA 95814  
R.04-04-003

LAURA GENAO  
ATTORNEY AT LAW  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770  
R.04-04-003

KATHERINE GENSLER  
FEDERAL ENERGY REGULATORY  
COMMISSION  
110 BLUE RAVINE RD., SUITE 107  
FOLSOM, CA 95630  
R.04-04-003

JACQUELINE GEORGE  
CALIFORNIA ENERGY RESOURCES  
SCHEDULING  
CALIFORNIA DEPARTMENT OF WATER  
RESOURCES  
3310 EL CAMINO AVE, RM. 120  
SACRAMENTO, CA 95821  
R.04-04-003

MICHAEL J. GIBBS  
ICF CONSULTING  
14724 VENTURA BLVD., NO. 1001  
SHERMAN OAKS, CA 91403  
R.04-04-003

PATRICIA GIDEON  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 770000  
SAN FRANCISCO, CA 94177  
R.04-04-003

MELANIE GILLETTE  
DUKE ENERGY NORTH AMERICA  
980 NINTH STREET, SUITE 1420  
SACRAMENTO, CA 95814  
R.04-04-003

ANNETTE GILLIAM  
SCE LAW DEPARTMENT  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770  
R.04-04-003

Sudheer Gokhale  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 4209  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

RAMONA GONZALEZ  
EAST BAY MUNICIPAL UTILITY DISTRICT  
375 ELEVENTH STREET, M/S NO. 205  
OAKLAND, CA 94607  
R.04-04-003

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Monday, September 10, 2007

JOHN GOODIN  
CALIFORNIA ISO  
151 BLUE RAVINE RD.  
FOLSOM, CA 95630  
R.04-04-003

JEFFREY P. GRAY  
ATTORNEY AT LAW  
DAVIS WRIGHT TREMAINE, LLP  
505 MONTGOMERY STREET, SUITE 800  
SAN FRANCISCO, CA 94111-6533  
R.04-04-003

STEVEN F. GREENWALD  
ATTORNEY AT LAW  
DAVIS WRIGHT TREMAINE, LLP  
505 MONTGOMERY STREET, SUITE 800  
SAN FRANCISCO, CA 94111-6533  
R.04-04-003

KAREN GRIFFIN  
EXECUTIVE OFFICE  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET, MS 39  
SACRAMENTO, CA 95814  
R.04-04-003

ANN G. GRIMALDI  
MCKENNA LONG & ALDRIDGE LLP  
101 CALIFORNIA STREET, 41ST FLOOR  
Center for Energy and Economic Development  
SAN FRANCISCO, CA 94111  
R.04-04-003

YVONNE GROSS  
REGULATORY POLICY MANAGER  
SEMPRA ENERGY  
101 ASH STREET  
SAN DIEGO, CA 92103  
R.04-04-003

BRIAN HANEY  
UTILITY SYSTEM EFFICIENCIES, INC.  
1000 BOURBON ST., 341  
NEW ORLEANS, LA 70116  
R.04-04-003

MIKHAIL HARAMATI  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

ARTHUR L. HAUBENSTOCK  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 7442  
SAN FRANCISCO, CA 94120  
R.04-04-003

LYNN HAUG  
ELLISON, SCHNEIDER & HARRIS, LLP  
2015 H STREET  
SACRAMENTO, CA 95816  
R.04-04-003

DANIEL M. HECHT  
101 ASH STREET, HQ 13D  
SAN DIEGO, CA 92101-3017  
R.04-04-003

DANIEL HECHT  
SEMPRA ENERGY TRADING CORP.  
58 COMMERCE ROAD, SUITE 940  
CENTER FOR CLEAN AIR POLICY  
STAMFORD, CT 06902  
R.04-04-003

TIM HEMIG  
DIRECTOR  
NRG ENERGY, INC.  
1819 ASTON AVENUE, SUITE 105  
CARLSBAD, CA 92008  
R.04-04-003

PHILIP HERRINGTON  
REGIONAL VP, BUSINESS MANAGEMENT  
EDISON MISSION ENERGY  
18101 VON KARMAN AVENUE, STE 1700  
IRVINE, CA 92612-1046  
R.04-04-003

Donna J Hines  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 4102  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

CHRISTOPHER HILEN  
ASSISTANT GENERAL COUNSEL  
SIERRA PACIFIC POWER COMPANY  
6100 NEIL ROAD  
RENO, NV 89511  
R.04-04-003

SETH D. HILTON  
STOEL RIVES  
111 SUTTER ST., SUITE 700  
SAN FRANCISCO, CA 94104  
R.04-04-003

GARY HINNERS  
RELIANT ENERGY, INC.  
PO BOX 148  
HOUSTON, TX 77001-0148  
R.04-04-003



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Monday, September 10, 2007

SAM HITZ  
CALIFORNIA CLIMATE ACTION REGISTRY  
515 S. FLOWER STREET, STE 1640  
LOS ANGELES, CA 90071  
R.04-04-003

Charlyn A Hook  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 5033  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

ANDREW HOERNER  
REDEFINING PROGRESS  
1904 FRANKLIN STREET, 6TH FLOOR  
OAKLAND, CA 94612  
R.04-04-003

RENEE HOFFMAN  
CITY OF ANAHEIM  
201 S. ANAHEIM BLVD., SUITE 902  
ANAHEIM, CA 92805  
R.04-04-003

JENNIFER HOLMES  
ITRON INC.  
11236 EL CAMINO REAL  
SAN DIEGO, CA 92130  
R.04-04-003

DAVID L. HUARD  
ATTORNEY AT LAW  
MANATT, PHELPS & PHILLIPS, LLP  
11355 WEST OLYMPIC BOULEVARD  
LOS ANGELES, CA 90064  
R.04-04-003

MARK R. HUFFMAN  
ATTORNEY AT LAW  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, B30A  
SAN FRANCISCO, CA 94105  
R.04-04-003

ELIZABETH HULL  
DEPUTY CITY ATTORNEY  
CITY OF CHULA VISTA  
276 FOURTH AVENUE  
CHULA VISTA, CA 91910  
R.04-04-003

TOM JARMAN  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, MAIL CODE B9A  
SAN FRANCISCO, CA 94105-1814  
R.04-04-003

MICHAEL JASKE  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET, MS-500  
SACRAMENTO, CA 95814  
R.04-04-003

JOHN JENSEN  
PRESIDENT  
MOUNTAIN UTILITIES  
PO BOX. 205  
PO BOX. 205  
KIRKWOOD, CA 95646  
R.04-04-003

MARC D. JOSEPH  
ATTORNEY AT LAW  
ADAMS, BROADWELL, JOSEPH & CARDOZO  
601 GATEWAY BLVD., STE. 1000  
SOUTH SAN FRANCISCO, CA 94080  
R.04-04-003

Bruce Kaneshiro  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

KURT J. KAMMERER  
EXECUTIVE DIRECTOR  
SAN DIEGO REGIONAL ENERGY OFFICE  
PO BOX 60738  
SAN DIEGO, CA 92166-8738  
R.04-04-003

JOSEPH M. KARP  
ATTORNEY AT LAW  
WINSTON & STRAWN LLP  
101 CALIFORNIA STREET  
SAN FRANCISCO, CA 94111-5802  
R.04-04-003

DAVID KATES  
DAVID MARK AND COMPANY  
3510 UNOCAL PLACE, SUITE 200  
SANTA ROSA, CA 95403-5571  
R.04-04-003

CURTIS KEBLER  
GOLDMAN, SACHS & CO.  
2121 AVENUE OF THE STARS  
LOS ANGELES, CA 90067  
R.04-04-003

RANDALL W. KEEN  
MANATT, PHELPS & PHILLIPS, LLP  
11355 WEST OLYMPICS BLVD.  
LOS ANGELES, CA 90064  
R.04-04-003

**R.04-04-003**

Monday, September 10, 2007

WENDY KEILANI  
SAN DIEGO GAS & ELECTRIC  
8330 CENTURY PARK COURT, CP32D  
SAN DIEGO, CA 92123  
R.04-04-003

DOUGLAS K. KERNER  
ATTORNEY AT LAW  
ELLISON, SCHNEIDER & HARRIS LLP  
2015 H STREET  
SACRAMENTO, CA 95814  
R.04-04-003

Sepideh Khosrowjah  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 4101  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

Robert Kinonian  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 4205  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

KIMBERLY KIENER  
IMPERIAL IRRIGATION DISTRICT  
504 CATALINA BLVD.  
SAN DIEGO, CA 92106  
R.04-04-003

CHRIS KING  
CALIFORNIA CONSUMER EMPOWERMENT  
ONE TWIN DOLPHIN DRIVE  
REDWOOD CITY, CA 94065  
R.04-04-003

GREGORY S.G. KLATT  
ATTORNEY AT LAW  
DOUGLASS & LIDDELL  
411 E. HUNTINGTON DRIVE, SUITE 107-356  
ARCADIA, CA 91006  
R.04-04-003

JOSEPH R. KLOBERDANZ  
SAN DIEGO GAS & ELECTRIC  
PO BOX 1831  
SAN DIEGO, CA 92112  
R.04-04-003

GARSON KNAPP  
FPL ENERGY, LLC  
770 UNIVERSE BLVD.  
JUNO BEACH, FL 33408  
R.04-04-003

LAWRENCE KOSTRZEWA  
REGIONAL VP, DEVELOPMENT  
EDISON MISSION ENERGY  
18101 VON KARMAN AVE., STE 1700  
IRVINE, CA 92612-1046  
R.04-04-003

AVIS KOWALEWSKI  
CALPINE CORPORATION  
3875 HOPYARD ROAD, SUITE 345  
PLEASANTON, CA 94588  
R.04-04-003

EDWARD V KURZ  
ATTORNEY AT LAW  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET  
SAN FRANCISCO, CA 94105  
R.04-04-003

IRYNA KWASNY  
DEPT. OF WATER RESOURCES-CERS  
DIVISION  
3310 EL CAMINO AVE., STE.120  
SACRAMENTO, CA 95821  
R.04-04-003

DAVID LA PORTE  
NAVIGANT CONSULTING  
3100 ZINFANDEL DRIVE, STE 600  
RANCHO CORDOVA, CA 95670-6078  
R.04-04-003

STEPHANIE LA SHAWN  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 770000, MAIL CODE B9A  
SAN FRANCISCO, CA 94177  
R.04-04-003

SHAYLEAH LABRAY  
PACIFICORP  
825 NE MULTNOMAH, SUITE 2000  
PORTLAND, OR 97232  
R.04-04-003

ERIC LARSEN  
ENVIRONMENTAL SCIENTIST  
RCM INTERNATIONAL, L.L.C.  
PO BOX 4716  
BERKELEY, CA 94704  
R.04-04-003

RICH LAUCKHART  
GLOBAL ENERGY  
2379 GATEWAY OAKS DR.  
SACRAMENTO, CA 95833  
R.04-04-003

**R.04-04-003**

Monday, September 10, 2007

Kenneth Lewis  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 4012  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

CONNIE LENI  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET MS-20  
SACRAMENTO, CA 95814  
R.04-04-003

MAUREEN LENNON  
CALIFORNIA COGENERATION COUNCIL  
595 EAST COLORADO BLVD., SUITE 623  
PASADENA, CA 91101  
R.04-04-003

JOHN W. LESLIE  
ATTORNEY AT LAW  
LUCE, FORWARD, HAMILTON & SCRIPPS,  
LLP  
11988 EL CAMINO REAL, SUITE 200  
SAN DIEGO, CA 92130  
R.04-04-003

ERIC LEUZE  
CALIFORNIA INDEPENDENT SYSTEM  
OPERATOR  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630  
R.04-04-003

Steve Linsey  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 2013  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

DONALD C. LIDDELL, P.C.  
DOUGLASS & LIDDELL  
2928 2ND AVENUE  
SAN DIEGO, CA 92103  
R.04-04-003

RONALD LIEBERT  
ATTORNEY AT LAW  
CALIFORNIA FARM BUREAU FEDERATION  
2300 RIVER PLAZA DRIVE  
SACRAMENTO, CA 95833  
R.04-04-003

KAREN LINDH  
LINDH & ASSOCIATES  
7909 WALERGA ROAD, NO. 112, PMB119  
ANTELOPE, CA 95843  
R.04-04-003

JANICE LIN  
MANAGING PARTNER  
STRATEGEN CONSULTING LLC  
146 VICENTE ROAD  
BERKELEY, CA 94705  
R.04-04-003

GRACE LIVINGSTON-NUNLEY  
ASSISTANT PROJECT MANAGER  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 770000 MAIL CODE B9A  
SAN FRANCISCO, CA 94177  
R.04-04-003

Scott Logan  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 4209  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

COLIN M. LONG  
PACIFIC ECONOMICS GROUP  
201 SOUTH LAKE AVENUE, SUITE 400  
PASADENA, CA 91101  
R.04-04-003

ED LUCHA  
PROJECT COORDINATOR  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 770000, MAIL CODE B9A  
SAN FRANCISCO, CA 94177  
R.04-04-003

LYNELLE LUND  
COMMERCE ENERGY, INC.  
600 ANTON BLVD., SUITE 2000  
COSTA MESA, CA 92626  
R.04-04-003

MARY LYNCH  
VP - REGULATORY AND LEGISLATIVE  
AFFAIRS  
CONSTELLATION ENERGY COMMODITIES  
GROUP  
2377 GOLD MEDAL WAY, SUITE 100  
GOLD RIVER, CA 95670  
R.04-04-003

BILL LYONS  
CORAL POWER, LLC  
4445 EASTGATE MALL, SUITE 100  
SAN DIEGO, CA 92121  
R.04-04-003

DIANA MAHMUD  
LEGAL DEPARTMENT  
STATE WATER CONTRACTORS  
PO BOX 54153  
LOS ANGELES, CA 90054-0153  
R.04-04-003

**R.04-04-003**

Monday, September 10, 2007

DAVID MARCUS  
PO BOX 1287  
BERKELEY, CA 94701  
R.04-04-003

WILLIAM B. MARCUS  
JBS ENERGY, INC.  
311 D STREET, SUITE A  
WEST SACRAMENTO, CA 95608  
R.04-04-003

JOHN MATTHEWS  
GEOLOGIST  
KERN COUNTY ASSESSOR'S OFFICE  
1115 TRUXTON AVENUE  
BAKERSFIELD, CA 93301  
R.04-04-003

CHRISTOPHER J. MAYER  
MODESTO IRRIGATION DISTRICT  
PO BOX 4060  
MODESTO, CA 95352-4060  
R.04-04-003

MICHAEL MAZUR  
CHIEF TECHNICAL OFFICER  
3 PHASES RENEWABLES, LLC  
2100 SEPULVEDA BLVD., SUITE 37  
MANHATTAN BEACH, CA 90266  
R.04-04-003

Wade McCartney  
CALIF PUBLIC UTILITIES COMMISSION  
770 L STREET, SUITE 1050  
SACRAMENTO, CA 95814  
R.04-04-003

KEITH MC CREA  
ATTORNEY AT LAW  
SUTHERLAND, ASBILL & BRENNAN  
1275 PENNSYLVANIA AVENUE, NW  
WASHINGTON, DC 20004-2415  
R.04-04-003

JIM MCARTHUR  
PLANT MANAGER  
ELK HILLS POWER, LLC  
4026 SKYLINE ROAD  
TUPMAN, CA 93276  
R.04-04-003

BARRY F. MCCARTHY  
ATTORNEY AT LAW  
MCCARTHY & BERLIN, LLP  
100 PARK CENTER PLAZA, SUITE 501  
SAN JOSE, CA 95113  
R.04-04-003

PATRICK MCDONNELL  
AGLAND ENERGY SERVICES, INC.  
2000 NICASIO VALLEY RD.  
NICASIO, CA 94946  
R.04-04-003

DOUGLAS MCFARIAN  
MIDWEST GENERATION EME  
440 WOUTH LASALLE STREET, SUITE 3500  
CHICAGO, IL 60605  
R.04-04-003

BRUCE MCLAUGHLIN  
ATTORNEY AT LAW  
BRAUN & BLAISING P.C.  
915 L STREET SUITE 1420  
SACRAMENTO, CA 95814  
R.04-04-003

JAMES MCMAHON  
SENIOR ENGAGEMENT MANAGER  
NAVIGANT CONSULTING, INC.  
3100 ZINFANDEL DRIVE, SUITE 600  
RANCHO CORDOVA, CA 95670-6078  
R.04-04-003

TANDY MCMANNES  
SOLAR THERMAL ELECTRIC ALLIANCE  
101 OCEAN BLUFFS BLVD.APT.504  
JUPITER, FL 33477-7362  
R.04-04-003

KEITH MELVILLE  
ATTORNEY AT LAW  
SAN DIEGO GAS & ELECTRIC COMPANY  
101 ASH STREET, HQ 13D  
SAN DIEGO, CA 92101  
R.04-04-003

MICHAEL MESSENGER  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET  
SACRAMENTO, CA 95814  
R.04-04-003

CHARLES R. MIDDLEKAUFF  
ATTORNEY  
PACIFIC GAS & ELECTRIC COMPANY  
PO BOX 7442 B30A  
SAN FRANCISCO, CA 94120  
R.04-04-003

ROSS A. MILLER  
ELECTRICITY ANALYSIS OFFICE  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET MS 20  
SACRAMENTO, CA 96814-5512  
R.04-04-003

**R.04-04-003**

Monday, September 10, 2007

KAREN NORENE MILLS  
ATTORNEY AT LAW  
CALIFORNIA FARM BUREAU FEDERATION  
2300 RIVER PLAZA DRIVE  
SACRAMENTO, CA 95833  
R.04-04-003

CYNTHIA K. MITCHELL  
530 COLGATE COURT  
RENO, NV 89503  
R.04-04-003

Lainie Motamedi  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 5119  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

RONALD MOORE  
GOLDEN STATE WATER/BEAR VALLEY  
ELECTRIC  
630 EAST FOOTHILL BOULEVARD  
SAN DIMAS, CA 91773  
R.04-04-003

GREGG MORRIS  
GREEN POWER INSTITUTE  
2039 SHATTUCK AVE., SUITE 402  
BERKELEY, CA 94704  
R.04-04-003

DAVID MORSE  
1411 W, COVELL BLVD., SUITE 106-292  
DAVIS, CA 95616-5934  
R.04-04-003

PHILLIP J. MULLER  
SCD ENERGY SOLUTIONS  
436 NOVA ALBION WAY  
SAN RAFAEL, CA 94903  
R.04-04-003

CLYDE MURLEY  
1031 ORDWAY STREET  
ALBANY, CA 94706  
R.04-04-003

SARA STECK MYERS  
ATTORNEY AT LAW  
LAW OFFICES OF SARA STECK MYERS  
122 - 28TH AVENUE  
SAN FRANCISCO, CA 94121  
R.04-04-003

CRYSTAL NEEDHAM  
SENIOR DIRECTOR, COUNSEL  
EDISON MISSION ENERGY  
18101 VON KARMAN AVE, STE 1700  
IRVINE, CA 92612-1046  
R.04-04-003

JESSICA NELSON  
PLUMAS-SIERRA RURAL ELECTRIC CO-OP  
73233 HIGHWAY 70 STE A  
PORTOLA, CA 96122-2000  
R.04-04-003

ROBERT S. NICHOLS  
NEW WEST ENERGY  
PO BOX 61868  
PHOENIX, AZ 85082-1868  
R.04-04-003

RICK C. NOGER  
PRAXAIR PLAINFIELD, INC.  
2711 CENTERVILLE ROAD, SUITE 400  
WILMINGTON, DE 19808  
R.04-04-003

KAREN NOTSUND  
ASSISTANT DIRECTOR  
UC ENERGY INSTITUTE  
2547 CHANNING WAY 5180  
BERKELEY, CA 94720-5180  
R.04-04-003

EDWARD W. O'NEILL  
ATTORNEY AT LAW  
DAVIS WRIGHT TREMAINE LLP  
505 MONTGOMERY STREET, SUITE 800  
SAN FRANCISCO, CA 94111-6533  
R.04-04-003

SARA O'NEILL  
CONSTELLATION NEW ENERGY, INC.  
ONE MARKET STREET  
SAN FRANCISCO, CA 94105  
R.04-04-003

Noel Obiora  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 4107  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

TIMOTHY R. ODIL  
MCKENNA LONG & ALDRIDGE LLP  
1875 LAWRENCE STREET, SUITE 200  
Center for Energy and Economic Development  
DENVER, CO 80202  
R.04-04-003

**R.04-04-003**

Monday, September 10, 2007

ARLEN ORCHARD  
ATTORNEY AT LAW  
SACRAMENTO MUNICIPAL UTILITY  
DISTRICT  
6201 S STREET, M.S. B406  
SACRAMENTO, CA 95817-1899  
R.04-04-003

FREDERICK M. ORTLIEB  
OFFICE OF CITY ATTORNEY  
CITY OF SAN DIEGO  
1200 THIRD AVENUE, SUITE 1100  
SAN DIEGO, CA 92101  
R.04-04-003

Karen P Paull  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 4300  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

Lisa Paulo  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

JOHN PACHECO  
ATTY. AT LAW  
SAN DIEGO GAS & ELECTRIC COMPANY  
101 ASH STREET  
SAN DIEGO, CA 92101  
R.04-04-003

DESPINA PAPAPOSTOLOU  
SAN DIEGO GAS AND ELECTRIC COMPANY  
8330 CENTURY PARK COURT-CP32H  
SAN DIEGO, CA 92123-1530  
R.04-04-003

BERJ K. PARSEGHIAN  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770  
R.04-04-003

Marion Peleo  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 4107  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

CARL PECHMAN  
POWER ECONOMICS  
901 CENTER STREET  
SANTA CRUZ, CA 95060  
R.04-04-003

NORMAN A. PEDERSEN  
ATTORNEY AT LAW  
HANNA AND MORTON, LLP  
444 SOUTH FLOWER STREET, SUITE 1500  
LOS ANGELES, CA 90071  
R.04-04-003

ROGER PELOTE  
WILLIAMS POWER COMPANY  
12736 CALIFA STREET  
VALLEY VILLAGE, CA 91607  
R.04-04-003

PHILIP D. PETTINGILL  
CALIFORNIA INDEPENDENT SYSTEM  
OPERATOR  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630  
R.04-04-003

JENNIFER PORTER  
POLICY AND OUTREACH MANAGER  
CALIFORNIA CENTER FOR SUSTAINABLE  
ENERGY  
8690 BALBOA AVENUE, STE. 100  
SAN DIEGO, CA 92123  
R.04-04-003

KEVIN PORTER  
EXETER ASSOCIATES, INC.  
5565 STERRETT PLACE  
COLUMBIA, MD 21044  
R.04-04-003

JENNIFER K. POST  
ATTORNEY AT LAW  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 7442  
SAN FRANCISCO, CA 94105  
R.04-04-003

WILLIAM E. POWERS  
POWERS ENGINEERING  
4452 PARK BLVD., STE. 209  
SAN DIEGO, CA 92116  
R.04-04-003

Terrie D Prosper  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 5301  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

RASHA PRINCE  
SOUTHERN CALIFORNIA GAS COMPANY  
555 WEST 5TH STREET, GT14D6  
LOS ANGELES, CA 90013  
R.04-04-003

**R.04-04-003**

Monday, September 10, 2007

NICOLAS PROCOS  
ALAMEDA POWER & TELECOM  
2000 GRAND STREET  
ALAMEDA, CA 94501-0263  
R.04-04-003

MARC PRYOR  
CALIFORNIA ENERGY COMMISSION  
1516 9TH ST, MS 20  
SACRAMENTO, CA 95814  
R.04-04-003

NANCY RADER  
CALIFORNIA WIND ENERGY ASSOCIATION  
2560 NINTH STREET, SUITE 213A  
BERKELEY, CA 94710  
R.04-04-003

STEVE RAHON  
DIRECTOR, TARIFF & REGULATORY  
ACCOUNTS  
SAN DIEGO GAS & ELECTRIC COMPANY  
8330 CENTURY PARK COURT, CP32C  
SAN DIEGO, CA 92123-1548  
R.04-04-003

MANUEL RAMIREZ  
CITY AND COUNTY OF SAN FRANCISCO  
1155 MARKET STREET, 4TH FLOOR  
SAN FRANCISCO, CA 94103  
R.04-04-003

JOHN R. REDDING  
ARCTURUS ENERGY CONSULTING  
44810 ROSEWOOD TERRACE  
MENDOCINO, CA 95460  
R.04-04-003

L. JAN REID  
COAST ECONOMIC CONSULTING  
3185 GROSS ROAD  
SANTA CRUZ, CA 95062  
R.04-04-003

EDWARD C. REMEDIOS  
33 TOLEDO WAY  
SAN FRANCISCO, CA 94123-2108  
R.04-04-003

Steve Roscow  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

THEODORE ROBERTS  
ATTORNEY AT LAW  
SEMPRA GLOBAL  
101 ASH STREET, HQ 13D  
SAN DIEGO, CA 92101-3017  
R.04-04-003

MICHAEL ROCHMAN  
SCHOOL PROJECT UTILITY RATE  
REDUCTION  
1430 WILLOW PASS ROAD, SUITE 240  
CONCORD, CA 94520  
R.04-04-003

GRANT A. ROSENBLUM  
ATTORNEY AT LAW  
CALIFORNIA INDEPENDENT SYSTEM  
OPERATOR  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630  
R.04-04-003

JAMES ROSS  
RCS, INC.  
500 CHESTERFIELD CENTER, SUITE 320  
CHESTERFIELD, MO 63017  
R.04-04-003

ROB RUNDLE  
SANDAG  
401 B STREET, SUITE 800  
SAN DIEGO, CA 92101  
R.04-04-003

Nancy Ryan  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 5217  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

SAM SALDER  
OREGON DEPARTMENT OF ENERGY  
625 NE MARION STREET  
SALEM, OR 97301-3737  
R.04-04-003

ROBERT SARVEY  
501 W. GRANTLINE RD  
TRACY, CA 95376  
R.04-04-003

SOUMYA SASTRY  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 770000  
SAN FRANCISCO, CA 94177  
R.04-04-003

**R.04-04-003**

Monday, September 10, 2007

DAVID SAUL  
COO  
SOLEL, INC.  
701 NORTH GREEN VALLEY PKY, STE 200  
HENDERSON, NV 89074  
R.04-04-003

Don Schultz  
CALIF PUBLIC UTILITIES COMMISSION  
770 L STREET, SUITE 1050  
RM. SCTO  
SACRAMENTO, CA 95814  
R.04-04-003

JANINE L. SCANCARELLI  
FOLGER LEVIN & KAHN LLP  
275 BATTERY STREET, 23RD FLOOR  
SAN FRANCISCO, CA 94111  
R.04-04-003

MICHAEL SCHMIDT  
SAN DIEGO GAS AND ELECTRIC COMPANY  
8330 CENTURY PARK CT. - CP32E  
SAN DIEGO, CA 92123  
R.04-04-003

REED V. SCHMIDT  
BARTLE WELLS ASSOCIATES  
1889 ALCATRAZ AVENUE  
BERKELEY, CA 94703-2714  
R.04-04-003

DONALD SCHOENBECK  
RCS, INC.  
900 WASHINGTON STREET, SUITE 780  
VANCOUVER, WA 98660  
R.04-04-003

LAURA J. SCOTT  
LANDS ENERGY CONSULTING INC.  
2366 EASTLAKE AVENUE EAST  
SEATTLE, WA 98102-3399  
R.04-04-003

PAUL M. SEBY  
MCKENNA LONG & ALDRIDGE LLP  
1875 LAWRENCE STREET, SUITE 200  
DENVER, CO 80202  
R.04-04-003

MICHAEL SHAMES  
ATTORNEY AT LAW  
UTILITY CONSUMERS' ACTION NETWORK  
3100 FIFTH AVENUE, SUITE B  
SAN DIEGO, CA 92103  
R.04-04-003

KAREN M SHEA  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

NORA SHERIFF  
ATTORNEY AT LAW  
ALCANTAR & KAHL LLP  
120 MONTGOMERY STREET, SUITE 2200  
SAN FRANCISCO, CA 94104  
R.04-04-003

LINDA Y. SHERIF  
ATTORNEY AT LAW  
CALPINE CORPORATION  
3875 HOPYARD ROAD, SUITE 345  
PLEASANTON, CA 94588  
R.04-04-003

Sean A. Simon  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

MARY O. SIMMONS  
SIERRA PACIFIC POWER COMPANY  
6100 NEIL ROAD, P.O. BOX 10100  
RENO, NV 89520  
R.04-04-003

JUNE M. SKILLMAN  
CONSULTANT  
2010 GREENLEAF STREET  
SANTA ANA, CA 92706  
R.04-04-003

TOM SKUPNJAK  
CPG ENERGY  
5211 BIRCH GLEN  
RICHMOND, TX 77469  
R.04-04-003

Donald R. Smith  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 4209  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

SHAWN SMALLWOOD, PH.D.  
3108 FINCH ST.  
DAVIS, CA 95616-0176  
R.04-04-003



**R.04-04-003**

Monday, September 10, 2007

MARK J. SMITH  
FPL ENERGY  
383 DIABLO RD., SUITE 100  
DANVILLE, CA 94526  
R.04-04-003

ROBIN SMUTNY-JONES  
CALIFORNIA ISO  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630  
R.04-04-003

JEANNE M. SOLE  
DEPUTY CITY ATTORNEY  
CITY AND COUNTY OF SAN FRANCISCO  
1 DR. CARLTON B. GOODLETT PLACE, RM.  
234  
SAN FRANCISCO, CA 94102  
R.04-04-003

ROBERT SPARKS  
CALIFORNIA INDEPENDANT SYSTEM  
OPERATOR  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630  
R.04-04-003

JAMES D. SQUERI  
ATTORNEY AT LAW  
GOODIN MACBRIDE SQUERI DAY &  
LAMPREY  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA 94111  
R.04-04-003

Merideth Sterkel  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

F. Jackson Stoddard  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 5040  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

Robert L. Strauss  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

STEPHEN ST. MARIE  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 5202  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

IRENE M. STILLINGS  
EXECUTIVE DIRECTOR  
CALIFORNIA CENTER FOR SUSTAINABLE  
ENERGY  
8690 BALBOA AVE., STE. 100  
SAN DIEGO, CA 92123  
R.04-04-003

KENNY SWAIN  
NAVIGANT CONSULTING  
3100 ZINFANDEL DRIVE, SUITE 600  
RANCHO CORDOVA, CA 95670  
R.04-04-003

Zenaida G. Tapawan-Conway  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

KAREN TERRANOVA  
ALCANTAR & KAHL, LLP  
120 MONTGOMERY STREET, STE 2200  
SAN FRANCISCO, CA 94104  
R.04-04-003

BRIAN THEAKER  
WILLIAMS POWER COMPANY  
3161 KEN DEREK LANE  
PLACERVILLE, CA 95667  
R.04-04-003

PATRICIA THOMPSON  
SUMMIT BLUE CONSULTING  
2920 CAMINO DIABLO, SUITE 210  
WALNUT CREEK, CA 94597  
R.04-04-003

CHARLES R. TOCA  
NATURAL GAS DEPARTMENT  
UTILITY SAVINGS & REFUND, LLC  
1100 QUAIL, SUITE 217  
NEWPORT BEACH, CA 92660  
R.04-04-003

WAYNE TOMLINSON  
EL PASO CORPORATION  
2 NORTH NEVADA AVENUE  
COLORADO SPRINGS, CO 80903  
R.04-04-003

NATHAN TOYAMA  
SACRAMENTO MUNICIPAL UTILITY  
DISTRICT  
6201 S STREET  
SACRAMENTO, CA 95852-1830  
R.04-04-003

**R.04-04-003**

Monday, September 10, 2007

MARK C TREXLER  
TREXLER CLIMATE+ENERGY SERVICES,  
INC.  
529 SE GRAND AVE,M SUITE 300  
PORTLAND, OR 97214-2232  
R.04-04-003

ANN L. TROWBRIDGE  
ATTORNEY AT LAW  
DAY CARTER & MURPHY, LLP  
3620 AMERICAN RIVER DRIVE, SUITE 205  
SACRAMENTO, CA 95864  
R.04-04-003

CRAIG TYLER  
TYLER & ASSOCIATES  
2760 SHASTA ROAD  
BERKELEY, CA 94708  
R.04-04-003

ANDREW J. VAN HORN  
VAN HORN CONSULTING  
12 LIND COURT  
ORINDA, CA 94563  
R.04-04-003

BETH VAUGHAN  
CALIFORNIA COGENERATION COUNCIL  
4391 N. MARSH ELDER COURT  
CONCORD, CA 94521  
R.04-04-003

EDWARD VINE  
LAWRENCE BERKELEY NATIONAL  
LABORATORY  
BUILDING 90-4000  
BERKELEY, CA 94720  
R.04-04-003

DEVRA WANG  
NATURAL RESOURCES DEFENSE COUNCIL  
111 SUTTER STREET, 20TH FLOOR  
SAN FRANCISCO, CA 94104  
R.04-04-003

JOY A. WARREN  
ATTORNEY AT LAW  
MODESTO IRRIGATION DISTRICT  
1231 11TH STREET  
MODESTO, CA 95354  
R.04-04-003

Mark S. Wetzell  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 5009  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

JAMES WEIL  
AGLET CONSUMER ALLIANCE  
PO BOX 37  
COOL, CA 95614  
R.04-04-003

LISA WEINZIMER  
CALIFORNIA ENERGY REPORTER  
PLATTS MCGRAW-HILL  
695 NINTH AVENUE, NO. 2  
SAN FRANCISCO, CA 94118  
R.04-04-003

ANDREA WELLER  
STRATEGIC ENERGY, LLC.  
7220 AVENDA ENCINAS, SUITE 120  
CARLSBAD, CA 92009  
R.04-04-003

PAMELA WELLNER  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ENERGY RESOURCES BRANCH AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

WILLIAM W. WESTERFIELD III  
ATTORNEY AT LAW  
ELLISON, SCHNEIDER & HARRIS L.L.P.  
2015 H STREET  
SACRAMENTO, CA 95814  
R.04-04-003

RON WETHERALL  
ELECTRICITY ANALYSIS OFFICE  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET MS 20  
SACRAMENTO, CA 96814-5512  
R.04-04-003

S. NANCY WHANG  
MANATT, PHELPS & PHILLIPS, LLP  
11355 W. OLYMPIC BLVD.  
LOS ANGELES, CA 90064  
R.04-04-003

GREGGORY L. WHEATLAND  
ATTORNEY AT LAW  
ELLISON, SCHNEIDER & HARRIS, LLP  
2015 H STREET  
SACRAMENTO, CA 95814  
R.04-04-003

KEITH WHITE  
931 CONTRA COSTA DRIVE  
EL CERRITO, CA 94530  
R.04-04-003

**R.04-04-003**

Monday, September 10, 2007

LORRAINE WHITE  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET, MS 39  
SACRAMENTO, CA 95814-5504  
R.04-04-003

JOSEPH B. WILLIAMS  
MCDERMOTT WILL & EMERGY LLP  
600 THIRTEENTH STREET, N.W.  
Morgan Stanley Capital Group Inc.  
WASHINGTON, D.C. 20005-3096  
R.04-04-003

VALERIE J. WINN  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 770000, B9A  
SAN FRANCISCO, CA 94177-0001  
R.04-04-003

RYAN WISER  
BERKELEY LAB  
ONE CYCLOTRON ROAD  
BERKELEY, CA 94720  
R.04-04-003

JAMES WOODRUFF  
ATTORNEY AT LAW  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770  
R.04-04-003

KEVIN WOODRUFF  
WOODRUFF EXPERT SERVICES, INC.  
1100 K STREET, SUITE 204  
SACRAMENTO, CA 95814  
R.04-04-003

DON WOOD  
PACIFIC ENERGY POLICY CENTER  
4539 LEE AVENUE  
LA MESA, CA 91941  
R.04-04-003

VIKKI WOOD  
SACRAMENTO MUNICIPAL UTILITY  
DISTRICT  
6301 S STREET, MS A204  
SACRAMENTO, CA 95817-1899  
R.04-04-003

ERIC C. WOYCHIK  
STRATEGY INTEGRATION LLC  
9901 CALODEN LANE  
OAKLAND, CA 94605  
R.04-04-003

JUSTIN C. WYNNE  
BRAU & BLAISING, P.C.  
915 L STREET, SUITE 1270  
SACRAMENTO, CA 95814  
R.04-04-003

CATHERINE E. YAP  
BARKOVICH & YAP, INC.  
PO BOX 11031  
OAKLAND, CA 94611  
R.04-04-003

Amy C Yip-Kikugawa  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 5135  
SAN FRANCISCO, CA 94102-3214  
R.04-04-003

JAMES YOUNG  
GENERAL ATTORNEY & ASSIST. GENERAL  
COUN  
AT&T CALIFORNIA  
525 MAKRET STREET, SUITE 1904  
SAN FRANCISCO, CA 94105  
R.04-04-003

MICHAEL A YUFFEE  
MCDERMOTT WILL & EMERY LLP  
600 THIRTEENTH STREET, N.W.  
WASHINGTON, DC 20005-3096  
R.04-04-003

CARLO ZORZOLI  
ENEL NORTH AMERICA, INC.  
1 TECH DRIVE, SUITE 220  
ANDOVER, MA 01810  
R.04-04-003

LEGAL AND REGULATORY DEPARTMENT  
CALIFORNIA ISO  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630  
R.04-04-003

CALIFORNIA ENERGY MARKETS  
517-B POTRERO AVE.  
SAN FRANCISCO, CA 94110-1431  
R.04-04-003

MRW & ASSOCIATES, INC.  
1814 FRANKLIN STREET, SUITE 720  
OAKLAND, CA 94612  
R.04-04-003

**R.04-04-025**

Monday, September 10, 2007

ABBAS M. ABED  
ASSOCIATE DIRECTOR  
NAVIGANT CONSULTING, INC.  
402 WEST BROADWAY, SUITE 400  
SAN DIEGO, CA 92101  
R.04-04-025

CASE ADMINISTRATION  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVE ROOM 370  
ROSEMEAD, CA 91770  
R.04-04-025

MICHAEL ALCANTAR  
ATTORNEY AT LAW  
ALCANTAR & KAHL LLP  
1300 SW FIFTH AVENUE, SUITE 1750  
PORTLAND, OR 97201  
R.04-04-025

GARY L. ALLEN  
SOUTHERN CALIFORNIA EDISON  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770  
R.04-04-025

ROD AOKI  
ATTORNEY AT LAW  
ALCANTAR & KAHL, LLP  
120 MONTGOMERY STREET, SUITE 2200  
SAN FRANCISCO, CA 94104  
R.04-04-025

HELEN ARRICK  
BUSINESS ENERGY COALITION  
PO BOX 770000  
MC B8R PGE  
SAN FRANCISCO, CA 94177-0001  
R.04-04-025

PHILIPPE AUCLAIR  
11 RUSSELL COURT  
WALNUT CREEK, CA 94598  
R.04-04-025

GEORGETTA J. BAKER  
ATTORNEY AT LAW  
SAN DIEGO GAS & ELECTRIC/SOCAL GAS  
101 ASH STREET, HQ 13  
SAN DIEGO, CA 92101  
R.04-04-025

BARBARA R. BARKOVICH  
BARKOVICH & YAP, INC.  
44810 ROSEWOOD TERRACE  
MENDOCINO, CA 95460  
R.04-04-025

CARMEN E. BASKETTE  
CORPORATE DEVELOPMENT PRINCIPAL  
594 HOWARD ST., SUITE 400  
SAN FRANCISCO, CA 94105  
R.04-04-025

TOM BEACH  
CROSSBORDER ENERGY  
2560 NINTH STREET, SUITE 213A  
BERKELEY, CA 94710-2557  
R.04-04-025

ROGER BERLINER  
PRESIDENT  
BERLINER LAW PLLC  
1747 PENNSYLVANIA AVE. N.W., STE 825  
WASHINGTON, DC 20006  
R.04-04-025

SCOTT BLAISING  
ATTORNEY AT LAW  
BRAUN & BLAISING, P.C.  
915 L STREET, SUITE 1420  
SACRAMENTO, CA 95814  
R.04-04-025

WILLIAM H. BOOTH  
ATTORNEY AT LAW  
LAW OFFICES OF WILLIAM H. BOOTH  
1500 NEWELL AVENUE, 5TH FLOOR  
WALNUT CREEK, CA 94596  
R.04-04-025

KAREN BOWEN  
ATTORNEY AT LAW  
WINSTON & STRAWN LLP  
101 CALIFORNIA STREET  
SAN FRANCISCO, CA 94111  
R.04-04-025

ANDREW B. BROWN  
ATTORNEY AT LAW  
ELLISON, SCHNEIDER & HARRIS, LLP  
2015 H STREET  
SACRAMENTO, CA 95814  
R.04-04-025

JEFF BROWN  
1200 PENNSYLVANIA AVE., NW  
WASHINGTON, DC 20460  
R.04-04-025

MARGARET D. BROWN  
ATTORNEY AT LAW  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 7442  
SAN FRANCISCO, CA 94120-7442  
R.04-04-025

**R.04-04-025**

Monday, September 10, 2007

MARK BRYON  
MANAGER, ASSET MANAGEMENT  
POWER SYSTEMS  
4300 RAILROAD AVENUE  
PITTSBURG, CA 94565  
R.04-04-025

NINA BUBNOVA  
CASE MANAGER  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 770000, MAIL CODE B9A  
SAN FRANCISCO, CA 94177  
R.04-04-025

DAN L. CARROLL  
ATTORNEY AT LAW  
DOWNEY BRAND LLP  
555 CAPITOL MALL, 10TH FLOOR  
SACRAMENTO, CA 95814  
R.04-04-025

Theresa Cho  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 5207  
SAN FRANCISCO, CA 94102-3214  
R.04-04-025

Susannah Churchill  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
R.04-04-025

HOWARD W. CHOY  
DIVISION MANAGER  
LOS ANGELES COUNTY ISD, FACILITIES  
OPERA  
1100 NORTH EASTERN AVENUE  
LOS ANGELES, CA 90063  
R.04-04-025

JANET COMBS  
ATTORNEY AT LAW  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770  
R.04-04-025

LARRY R. COPE  
ATTORNEY AT LAW  
SOUTHERN CALIFORNIA EDISON  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770  
R.04-04-025

RICHARD H. COUNIHAN  
SR. DIRECTOR CORPORATE  
DEVELOPMENT  
ENERNOC, INC.  
594 HOWARD ST., SUITE 400  
SAN FRANCISCO, CA 94105  
R.04-04-025

BRIAN T. CRAGG  
ATTORNEY AT LAW  
GOODIN, MACBRIDE, SQUERI, RITCHIE &  
DAY  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA 94111  
R.04-04-025

RON DAHLIN  
PLANT MANAGER  
CARDINAL COGEN, INC.  
288 CAMPUS DRIVE WEST  
STANFORD, CA 94305  
R.04-04-025

DOUG DAVIE  
DAVIE CONSULTING, LLC  
3390 BEATTY DRIVE  
EL DORADO HILLS , CA 95762  
R.04-04-025

LISA DECARLO  
STAFF COUNSEL  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET MS-14  
SACRAMENTO, CA 95814  
R.04-04-025

RALPH DENNIS  
DIRECTOR, REGULATORY AFFAIRS  
FELLON-MCCORD & ASSOCIATES  
9960 CORPORATE CAMPUS DRIVE, SUITE  
2000  
LOUISVILLE, KY 40223  
R.04-04-025

CHRIS ANN DICKERSON, PHD  
FREEMAN, SULLIVAN & CO.  
100 SPEAR ST., 17/F  
SAN FRANCISCO, CA 94105  
R.04-04-025

Paul Douglas  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
R.04-04-025

KEVIN DUGGAN  
CALPINE COPORATION  
3875 HOPYARD ROAD, SUITE 345  
PLEASANTON, CA 94588  
R.04-04-025

RICHARD D. ELY  
DAVIS HYDRO  
27264 MEADOWBROOK DRIVE  
DAVIS, CA 95618  
R.04-04-025

**R.04-04-025**

Monday, September 10, 2007

RICHARD M. ESTEVES  
SESCO, INC.  
77 YACHT CLUB DRIVE, SUITE 1000  
LAKE HOPATCONG, NJ 7849  
R.04-04-025

ANNE FALCON  
EES CONSULTING, INC.  
570 KIRKLAND AVE  
KIRLAND, WA 98033  
R.04-04-025

DIANE I. FELLMAN  
LAW OFFICE OF DIANE I. FELLMAN  
234 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102  
R.04-04-025

LAW DEPARTMENT FILE ROOM  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 7442  
SAN FRANCISCO, CA 94120-7442  
R.04-04-025

CENTRAL FILES  
SAN DIEGO GAS & ELECTRIC  
8330 CENTURY PARK COURT, CP31E  
SAN DIEGO, CA 92123  
R.04-04-025

MICHEL PETER FLORIO  
ATTORNEY AT LAW  
THE UTILITY REFORM NETWORK (TURN)  
711 VAN NESS AVENUE, SUITE 350  
SAN FRANCISCO, CA 94102  
R.04-04-025

KEVIN T. FOX  
WILSON SONSINI GOODRICH AND ROSATI  
ONE MARKET, SPEAR TOWER  
SAN FRANCISCO, CA 94105-1126  
R.04-04-025

MATTHEW FREEDMAN  
ATTORNEY AT LAW  
THE UTILITY REFORM NETWORK  
711 VAN NESS AVENUE, SUITE 350  
SAN FRANCISCO, CA 94102  
R.04-04-025

JOHN GALLOWAY  
UNION OF CONCERNED SCIENTISTS  
2397 SHATTUCK AVENUE, SUITE 203  
BERKELEY, CA 94704  
R.04-04-025

LAURA GENAO  
ATTORNEY AT LAW  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770  
R.04-04-025

RICHARD GERMAIN  
NAVIGANT CONSULTING, INC.  
ONE MARKET ST. SPEAR ST TOWER, STE  
1200  
SAN FRANCISCO, CA 94105  
R.04-04-025

ROBERT B. GEX  
ATTORNEY AT LAW,  
DAVIS WRIGHT TREMAINE LLP  
505 MONTGOMERY STREET, SUITE 800  
SAN FRANCISCO, CA 94111-6533  
R.04-04-025

STEVEN A. GREENBERG  
DISTRIBUTED ENERGY STRATEGIES  
4100 ORCHARD CANYON LANE  
VACAVILLE, CA 95688  
R.04-04-025

STEVEN F. GREENWALD  
ATTORNEY AT LAW  
DAVIS WRIGHT TREMAINE, LLP  
505 MONTGOMERY STREET, SUITE 800  
SAN FRANCISCO, CA 94111-6533  
R.04-04-025

DANIEL V. GULINO  
RIDGEWOOD POWER MANAGEMENT, LLC  
947 LINWOOD AVENUE  
RIDGEWOOD, NJ 7450  
R.04-04-025

Julie Halligan  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 2203  
SAN FRANCISCO, CA 94102-3214  
R.04-04-025

PETER W. HANSCHEN  
ATTORNEY AT LAW  
MORRISON & FOERSTER, LLP  
101 YGNACIO VALLEY ROAD, SUITE 450  
WALNUT CREEK, CA 94596  
R.04-04-025

MIKHAIL HARAMATI  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
R.04-04-025

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Monday, September 10, 2007

MARK HARRER  
56 ST. TIMOTHY CT.  
DANVILLE, CA 94526  
R.04-04-025

Donna J Hines  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 4102  
SAN FRANCISCO, CA 94102-3214  
R.04-04-025

SETH D. HILTON  
STOEL RIVES  
111 SUTTER ST., SUITE 700  
SAN FRANCISCO, CA 94104  
R.04-04-025

JEFF HIRSCH  
JAMES J. HIRSCH & ASSOCIATES  
12185 PRESILLA ROAD  
CAMARILLO, CA 93012-9243  
R.04-04-025

PATRICK HOLLEY  
COVANTA ENERGY CORPORATION  
2829 CHILDRESS DR  
ANDERSON, CA 96007-3563  
R.04-04-025

PHILIP HOOVER  
H & M ENGINEERING, INC.  
4521 ALPINE ROSE BEND  
ELLICOTT CITY, MD 21042  
R.04-04-025

MARK R. HUFFMAN  
ATTORNEY AT LAW  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET  
SAN FRANCISCO, CA 94105  
R.04-04-025

ERIC J. ISKEN  
ATTORNEY AT LAW  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770  
R.04-04-025

MICHAEL JASKE  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET, MS-500  
SACRAMENTO, CA 95814  
R.04-04-025

MARC D. JOSEPH  
ATTORNEY AT LAW  
ADAMS, BROADWELL, JOSEPH & CARDOZO  
601 GATEWAY BLVD., STE. 1000  
SOUTH SAN FRANCISCO, CA 94080  
R.04-04-025

EVELYN KAHL  
ATTORNEY AT LAW  
ALCANTAR & KAHL, LLP  
120 MONTGOMERY STREET, SUITE 2200  
SAN FRANCISCO, CA 94104  
R.04-04-025

CURTIS KEBLER  
GOLDMAN, SACHS & CO.  
2121 AVENUE OF THE STARS  
LOS ANGELES, CA 90067  
R.04-04-025

STEVEN KELLY  
INDEPENDENT ENERGY PRODUCERS ASSN  
1215 K STREET, SUITE 900  
SACRAMENTO, CA 95814-3947  
R.04-04-025

DOUGLAS K. KERNER  
ATTORNEY AT LAW  
ELLISON, SCHNEIDER & HARRIS LLP  
2015 H STREET  
SACRAMENTO, CA 95814  
R.04-04-025

CHRIS KING  
CALIFORNIA CONSUMER EMPOWERMENT  
ONE TWIN DOLPHIN DRIVE  
REDWOOD CITY, CA 94065  
R.04-04-025

JOSEPH KLOBERDANZ  
SAN DIEGO GAS & ELECTRIC COMPANY  
8330 CENTURY PARK COURT  
SAN DIEGO, CA 92123  
R.04-04-025

MARC KOLB  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, B918  
SAN FRANCISCO, CA 94105  
R.04-04-025

EDWARD V KURZ  
ATTORNEY AT LAW  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET  
SAN FRANCISCO, CA 94105  
R.04-04-025

**R.04-04-025**

Monday, September 10, 2007

IRYNA KWASNY  
DEPT. OF WATER RESOURCES-CERS  
DIVISION  
3310 EL CAMINO AVE., STE.120  
SACRAMENTO, CA 95821  
R.04-04-025

STEPHANIE LA SHAWN  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 770000, MAIL CODE B9A  
SAN FRANCISCO, CA 94177  
R.04-04-025

PETER LAI  
CALIF PUBLIC UTILITIES COMMISSION  
320 WEST 4TH STREET SUITE 500  
LOS ANGELES, CA 90013  
R.04-04-025

RICHARD LAUCKHART  
HENWOOD ENERGY SERVICES, INC.  
2379 GATEWAY OAKS DRIVE, SUITE 200  
SACRAMENTO, CA 95833  
R.04-04-025

STEVEN A. LEFTON  
VP POWER PLANT PROJECTS  
APTECH ENGINEERING SERVICES INC.  
PO BOX 3440  
SUNNYVALE, CA 94089-3440  
R.04-04-025

MAUREEN LENNON  
CALIFORNIA COGENERATION COUNCIL  
595 EAST COLORADO BLVD., SUITE 623  
PASADENA, CA 91101  
R.04-04-025

JOHN W. LESLIE  
ATTORNEY AT LAW  
LUCE, FORWARD, HAMILTON & SCRIPPS,  
LLP  
11988 EL CAMINO REAL, SUITE 200  
SAN DIEGO, CA 92130  
R.04-04-025

Steve Linsey  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 2013  
SAN FRANCISCO, CA 94102-3214  
R.04-04-025

DONALD C. LIDDELL, P.C.  
DOUGLASS & LIDDELL  
2928 2ND AVENUE  
SAN DIEGO, CA 92103  
R.04-04-025

KAREN LINDH  
LINDH & ASSOCIATES  
7909 WALERGA ROAD, NO. 112, PMB119  
ANTELOPE, CA 95843  
R.04-04-025

GRACE LIVINGSTON-NUNLEY  
ASSISTANT PROJECT MANAGER  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 770000 MAIL CODE B9A  
SAN FRANCISCO, CA 94177  
R.04-04-025

BARRY LOVELL  
BERRY PETROLEUM COMPANY  
5201 TRUXTUN AVE., SUITE 300  
BAKERSFIELD, CA 93309  
R.04-04-025

ED LUCHA  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, MAIL CODE B9A  
SAN FRANCISCO, CA 94105  
R.04-04-025

Jaclyn Marks  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 5306  
SAN FRANCISCO, CA 94102-3214  
R.04-04-025

ALEXANDRE B. MAKLER  
CALPINE CORPORATION  
3875 HOPYARD ROAD, SUITE 345  
PLEASANTON, CA 94588  
R.04-04-025

WILLIAM B. MARCUS  
JBS ENERGY, INC.  
311 D STREET, SUITE A  
WEST SACRAMENTO, CA 95608  
R.04-04-025

JOHN MATTHEWS  
GEOLOGIST  
KERN COUNTY ASSESSOR'S OFFICE  
1115 TRUXTON AVENUE  
BAKERSFIELD, CA 93301  
R.04-04-025

CHRISTOPHER J. MAYER  
MODESTO IRRIGATION DISTRICT  
PO BOX 4060  
MODESTO, CA 95352-4060  
R.04-04-025



**R.04-04-025**

Monday, September 10, 2007

Wade McCartney  
CALIF PUBLIC UTILITIES COMMISSION  
770 L STREET, SUITE 1050  
SACRAMENTO, CA 95814  
R.04-04-025

RICHARD MCCANN  
M.CUBED  
2655 PORTAGE BAY ROAD, SUITE 3  
DAVIS, CA 95616  
R.04-04-025

LIZBETH MCDANNEL  
2244 WALNUT GROVE AVE., QUAD 4D  
ROSEMEAD, CA 91770  
R.04-04-025

PATRICK MCDONNELL  
AGLAND ENERGY SERVICES, INC.  
2000 NICASIO VALLEY RD.  
NICASIO, CA 94946  
R.04-04-025

TANDY MCMANNES  
SOLAR THERMAL ELECTRIC ALLIANCE  
101 OCEAN BLUFFS BLVD.APT.504  
JUPITER, FL 33477-7362  
R.04-04-025

KEVIN R. MCSPADDEN  
ATTORNEY AT LAW  
MILBANK,TWEED,HADLEY&MCCLOY LLP  
601 SOUTH FIGUEROA STREET, 30TH  
FLOOR  
LOS ANGELES, CA 90068  
R.04-04-025

BRADLEY MEISTER  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET, MS-26  
SACRAMENTO, CA 95814  
R.04-04-025

MARY ANN MILLER  
ELECTRICITY ANALYSIS OFFICE  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET, MS 20  
SACRAMENTO, CA 96814-5512  
R.04-04-025

Joy Morgenstern  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
R.04-04-025

GREGG MORRIS  
GREEN POWER INSTITUTE  
2039 SHATTUCK AVE., SUITE 402  
BERKELEY, CA 94704  
R.04-04-025

CLYDE MURLEY  
1031 ORDWAY STREET  
ALBANY, CA 94706  
R.04-04-025

SARA STECK MYERS  
ATTORNEY AT LAW  
LAW OFFICES OF SARA STECK MYERS  
122 - 28TH AVENUE  
SAN FRANCISCO, CA 94121  
R.04-04-025

CYRSTAL NEEDHAM  
SENIOR DIRECTOR, COUNSEL  
EDISON MISSION ENERGY  
18101 VON KARMAN AVENUE  
IRVINE, CA 92612-1046  
R.04-04-025

Noel Obiora  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 4107  
SAN FRANCISCO, CA 94102-3214  
R.04-04-025

REN ORENS  
ENERGY AND ENVIRONMENTAL  
ECONOMICS  
353 SACRAMENTO ST., STE 1700  
SAN FRANCISCO, CA 94111  
R.04-04-025

BERJ K. PARSEGHIAN  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770  
R.04-04-025

STEVE PATRICK  
SEMPRA ENERGY UTILITIES  
555 W. 5TH STREET GT14E7  
LOS ANGELES, CA 90051  
R.04-04-025

Marion Peleo  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 4107  
SAN FRANCISCO, CA 94102-3214  
R.04-04-025

**R.04-04-025**

Monday, September 10, 2007

CARL PECHMAN  
POWER ECONOMICS  
901 CENTER STREET  
SANTA CRUZ, CA 95060  
R.04-04-025

JANIS C. PEPPER  
CLEAN POWER MARKETS, INC.  
PO BOX 3206  
LOS ALTOS, CA 94024  
R.04-04-025

SNULLER PRICE  
ENERGY AND ENVIRONMENTAL  
ECONOMICS  
101 MONTGOMERY, SUITE 1600  
SAN FRANCISCO, CA 94104  
R.04-04-025

ERIN RANSLOW  
NAVIGANT CONSULTING, INC.  
3100 ZINFANDEL DRIVE, SUITE 600  
RANCHO CORDOVA, CA 95670-6078  
R.04-04-025

DAVID REYNOLDS  
MEMBER SERVICES MANAGER  
NORTHERN CALIFORNIA POWER AGENCY  
180 CIRBY WAY  
ROSEVILLE, CA 95678-6420  
R.04-04-025

Thomas Roberts  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 4205  
SAN FRANCISCO, CA 94102-3214  
R.04-04-025

LAURA ROOKE  
SR. PROJECT MANAGER  
PORTLAND GENERAL ELECTRIC  
121 SW SALMON ST.,  
PORTLAND, OR 97204  
R.04-04-025

JAMES ROSS  
RCS, INC.  
500 CHESTERFIELD CENTER, SUITE 320  
CHESTERFIELD, MO 63017  
R.04-04-025

JUDITH SANDERS  
CALIFORNIA ISO  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630  
R.04-04-025

DAVID SAUL  
COO  
SOLEL, INC.  
701 NORTH GREEN VALLEY PKY, STE 200  
HENDERSON, NV 89074  
R.04-04-025

REED V. SCHMIDT  
BARTLE WELLS ASSOCIATES  
1889 ALCATRAZ AVENUE  
BERKELEY, CA 94703-2714  
R.04-04-025

DONALD SCHOENBECK  
RCS, INC.  
900 WASHINGTON STREET, SUITE 780  
VANCOUVER, WA 98660  
R.04-04-025

ROBERT SHAPIRO  
CHADBOURNE & PARKE LLP  
1200 NEW HAMPSHIRE AVE. NW  
WASHINGTON, DC 20036  
R.04-04-025

NORA SHERIFF  
ATTORNEY AT LAW  
ALCANTAR & KAHL LLP  
120 MONTGOMERY STREET, SUITE 2200  
SAN FRANCISCO, CA 94104  
R.04-04-025

JENNIFER SHIGEKAWA  
ATTORNEY AT LAW  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770  
R.04-04-025

WILLIAM P. SHORT  
RIDGEWOOD POWER MANAGEMENT, LLC  
947 LINWOOD AVENUE  
RIDGEWOOD, NJ 7450  
R.04-04-025

Sean A. Simon  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
R.04-04-025

JUNE M. SKILLMAN  
CONSULTANT  
2010 GREENLEAF STREET  
SANTA ANA, CA 92706  
R.04-04-025

**R.04-04-025**

Monday, September 10, 2007

CAROL A. SMOOTS  
PERKINS COIE LLP  
607 FOURTEENTH STREET, NW, SUITE 800  
WASHINGTON, DC 20005  
R.04-04-025

ANAN H. SOKKER  
LEGAL ASSISTANT  
CHADBOURNE & PARKE LLP  
1200 NEW HAMPSHIRE AVE. NW  
WASHINGTON, DC 20036  
R.04-04-025

Merideth Sterkel  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
R.04-04-025

Robert L. Strauss  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
R.04-04-025

GREY STAPLES  
THE MENDOTA GROUP, LLC  
1830 FARO LANE  
SAINT PAUL, MN 55118  
R.04-04-025

PATRICK STONER  
PROGRAM DIRECTOR  
LOCAL GOVERNMENT COMMISSION  
1303 J STREET, SUITE 250  
SACRAMENTO, CA 95814  
R.04-04-025

JOHN SUGAR  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET, MS 42  
SACRAMENTO, CA 95814  
R.04-04-025

KENNY SWAIN  
NAVIGANT CONSULTING  
3100 ZINFANDEL DRIVE, SUITE 600  
RANCHO CORDOVA, CA 95670  
R.04-04-025

George S Tagnipes  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ENERGY DIVISION AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
R.04-04-025

Christine S Tam  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 4209  
SAN FRANCISCO, CA 94102-3214  
R.04-04-025

KAREN TERRANOVA  
ALCANTAR & KAHL, LLP  
120 MONTGOMERY STREET, STE 2200  
SAN FRANCISCO, CA 94104  
R.04-04-025

PATRICIA THOMPSON  
SUMMIT BLUE CONSULTING  
2920 CAMINO DIABLO, SUITE 210  
WALNUT CREEK, CA 94597  
R.04-04-025

EDWARD J TIEDEMANN  
KRONICK MOSKOVITZ TIEDEMANN AND  
GIRARD  
400 CAPITOL MALL  
SACRAMENTO, CA 95814  
R.04-04-025

NANCY TRONAAS  
CALIFORNIA ENERGY COMMISSION  
1516 9TH ST. MS-20  
SACRAMENTO, CA 95814-5512  
R.04-04-025

BETH VAUGHAN  
CALIFORNIA COGENERATION COUNCIL  
4391 N. MARSH ELDER COURT  
CONCORD, CA 94521  
R.04-04-025

ROBIN J. WALTHER  
1380 OAK CREEK DRIVE, NO. 316  
PALO ALTO, CA 94304-2016  
R.04-04-025

DEVRA WANG  
NATURAL RESOURCES DEFENSE COUNCIL  
111 SUTTER STREET, 20TH FLOOR  
SAN FRANCISCO, CA 94104  
R.04-04-025

JOY WARREN  
SENIOR STAFF ATTORNEY  
MODESTO IRRIGATION DISTRICT  
1231 ELEVENTH STREET  
MODESTO, CA 95354  
R.04-04-025

**R.04-04-025**

Monday, September 10, 2007

TORY S. WEBER  
SOUTHERN CALIFORNIA EDISON COMPANY  
2131 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770  
R.04-04-025

LISA WEINZIMER  
CALIFORNIA ENERGY REPORTER  
PLATTS MCGRAW-HILL  
695 NINTH AVENUE, NO. 2  
SAN FRANCISCO, CA 94118  
R.04-04-025

PAMELA WELLNER  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ENERGY RESOURCES BRANCH AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
R.04-04-025

WILLIAM W. WESTERFIELD, 111  
ATTORNEY AT LAW  
ELLISON, SCHNEIDER & HARRIS L.L.P.  
2015 H STREET  
SACRAMENTO, CA 95814  
R.04-04-025

Michael Wheeler  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
R.04-04-025

VALERIE J. WINN  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 770000, B9A  
SAN FRANCISCO, CA 94177-0001  
R.04-04-025

JAMES B. WOODRUFF  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVENUE, SUITE 342,  
GO1  
ROSEMEAD, CA 91770  
R.04-04-025

KEVIN WOODRUFF  
WOODRUFF EXPERT SERVICES, INC.  
1100 K STREET, SUITE 204  
SACRAMENTO, CA 95814  
R.04-04-025

DON WOOD  
PACIFIC ENERGY POLICY CENTER  
4539 LEE AVENUE  
LA MESA, CA 91941  
R.04-04-025

VIKKI WOOD  
SACRAMENTO MUNICIPAL UTILITY  
DISTRICT  
6301 S STREET, MS A204  
SACRAMENTO, CA 95817-1899  
R.04-04-025

SHIRLEY WOO  
ATTORNEY AT LAW  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, B30A  
SAN FRANCISCO, CA 94105  
R.04-04-025

JOY C. YAMAGATA  
SAN DIEGO GAS & ELECTRIC/SOCALGAS  
8330 CENTURY PARK COURT  
SAN DIEGO, CA 91910  
R.04-04-025

Amy C Yip-Kikugawa  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 5135  
SAN FRANCISCO, CA 94102-3214  
R.04-04-025

CARLO ZORZOLI  
ENEL NORTH AMERICA, INC.  
1 TECH DRIVE, SUITE 220  
ANDOVER, MA 1810  
R.04-04-025

LEGAL AND REGULATORY DEPARTMENT  
CALIFORNIA ISO  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630  
R.04-04-025

CALIFORNIA ENERGY MARKETS  
517-B POTRERO AVE.  
SAN FRANCISCO, CA 94110  
R.04-04-025

MRW & ASSOCIATES, INC.  
1814 FRANKLIN STREET, SUITE 720  
OAKLAND, CA 94612  
R.04-04-025